

FINDING OF NO SIGNIFICANT IMPACT
ENVIRONMENTAL ASSESSMENT
CONSTRUCTION OF NEW RECREATIONAL LODGING AT BELLOWS AIR FORCE
STATION, O'AHU, HAWAII

INTRODUCTION

The United States (U.S.) Air Force (Air Force), Detachment 2, 18th Wing is proposing to construct new recreational lodging units at Bellows Air Force Station (AFS) on the island of O'ahu, Hawai'i. The proposed project would be federally funded and therefore triggers the environmental review process mandated under the National Environmental Policy Act (NEPA) of 1969.

The Draft Environmental Assessment (EA) analyzes potential impacts to the human and/or natural environment resulting from implementation of the Proposed Action or the No-Action Alternative. The EA was prepared in accordance with the NEPA of 1969, as amended (42 U.S. Code [U.S.C.] Sections (§) 4321-4374), the Council on Environmental Quality (CEQ) regulations implementing the procedural provisions of NEPA (40 Code of Federal Regulations [CFR] Parts 1500-1508), and Air Force policy and procedures (32 CFR Part 989).

PURPOSE OF AND NEED FOR ACTION

The purpose of the proposed action is to construct new recreational lodging units at Bellows AFS, thereby providing additional recreational lodging for military personnel. The need arises because the existing recreational cabins are operating at full capacity year round and Bellows AFS is not able to meet its current lodging demand and, therefore, its mission of *enhancing combat effectiveness by delivering secure, affordable, and customer-focused recreational services*.

DESCRIPTION OF THE PROPOSED ACTION

The original proposed action was to construct up to 48 additional recreational lodging units at Bellows AFS, along with supporting utilities and infrastructure. However, based on public input, the Air Force has determined that only up to 16 units will now be constructed and this Decision Document has been prepared on the construction of 16 units, not the 48 units originally proposed. The lodging units would be constructed within the northern end of the former runway 3L-21R and an adjacent grassed area west of Tinker Road. Proposed lodging units would be constructed in multi-unit one- to two-story buildings with individual units ranging from 600 to 750 square feet (ft²) each.

Sewer service for the new lodging units would be provided through the use of septic systems with leach fields. Development of individual wastewater systems (IWS), such as septic tanks and leach fields, must conform to the requirements of Hawai'i Administrative Rules (HAR) 11-62, *Wastewater Systems*. Key requirements that must be met include: 1) total wastewater flow from the development would not exceed 15,000 gallons per day (gpd), 2) total wastewater flow into each IWS not exceeding 1,000 gpd, and 3) 10,000 ft² of usable land area be available for each IWS. Wastewater plans are subject to the review and approval of the Director of the Department of Health (DOH). Upon commencement of design, the Air Force will coordinate design of the IWS with the DOH Wastewater Branch to ensure compliance with HAR Chapter 11-62. The IWS will be designed to provide capacity to meet the projected increase in wastewater demand, such that no adverse impacts will be anticipated.

Water and electrical service for the new lodging units is available along Pacific Lane and would be extended to the new lodging units underground. A new access road providing access via Tinker Road would be constructed in addition to parking areas. Parking areas would be sized to provide 1 to 2 parking spaces per unit.

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14. ABSTRACT

This Final EA evaluates the potential environmental consequences associated with the proposed construction of new recreational lodging at Bellows AFS, O‘ahu, Hawai‘i. This Final EA has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code Sections 4321-4374), the Council on Environmental Quality regulations implementing the procedural provisions of NEPA (40 Code of Federal Regulations [CFR] Parts 1500-1508), and Air Force policy and procedures (32 CFR Part 989). The proposed action is to construct up to 48 additional recreational lodging units at Bellows AFS. Lodging units would be constructed in multi-unit one- to two-story buildings with individual units ranging from approximately 600 to 750 square feet each. The no-action alternative, under which no additional recreational lodging units would be constructed at Bellows AFS. The environmental impacts of the proposed action and no-alternative are summarized below has also been examined. In addition, three proposed alternative actions were considered but not carried forward for reasons identified in this document. Proposed Action. The proposed action would construct up to 48 additional recreational lodging units and supporting utilities and infrastructure at Bellows AFS. No impacts are expected for biological resources, land use and ownership, natural hazards, or socioeconomics. Long-term positive impacts are expected for recreational resources. Short-term adverse construction-related impacts to air quality, geology and soils, hazardous materials and hazardous waste, noise, safety and health, visual resources, and water resources are possible during implementation of the proposed action. However, best management practices to be implemented during construction would reduce these impacts. Subsurface cultural resources consisting of fire-pits and associated cooking stones, and small collections of fish bone and marine shells dating to the traditional Hawaiian period were identified in the northeastern end of the proposed project area. To mitigate impacts to these cultural resources, a data recovery program would be undertaken within this portion of the project area prior to the commencement of construction. No-Action Alternative. Under this alternative, no additional recreational lodging units would be constructed at Bellows AFS. There is a significant unmet demand for recreational lodging for military personnel at Bellows AFS. If the proposed project is not completed, military personnel would be denied reservations due to the limited number of cabins, thereby impeding the installation’s ability to fulfill its mission of enhancing combat effectiveness by delivering secure affordable, and customer-focused recreational services.

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DESCRIPTION OF ALTERNATIVES

The EA analyzes a No-Action alternative, under which no additional recreational lodging units would be constructed at Bellows AFS.

In addition, three alternative project locations were considered during project development but subsequently eliminated from further consideration due to archaeological concerns or other site constraints. The alternatives considered but not carried forward for analysis, and the rationale for their dismissal, is summarized in the Final EA.

SUMMARY OF ENVIRONMENTAL CONSEQUENCES

Proposed Action. The proposed action would construct up to 16 additional recreational lodging units and supporting utilities and infrastructure at Bellows AFS. No impacts are expected for biological resources, land use and ownership, natural hazards, or socioeconomic. Long-term positive impacts are expected for recreational resources. Short-term adverse construction-related impacts to air quality, geology and soils, hazardous materials and hazardous waste, noise, safety and health, visual resources, and water resources are possible during implementation of the proposed action. However, best management practices to be implemented during construction would reduce these impacts.

Subsurface cultural resources consisting of fire-pits and associated cooking stones, and small collections of fish bone and marine shells dating to the traditional Hawaiian period were identified in the northeastern end of the proposed project area during a pre-construction archaeological inventory survey. To mitigate impacts to these cultural resources, a data recovery program would be undertaken within this portion of the project area prior to the commencement of construction.

No-Action Alternative. Under this alternative, no additional recreational lodging units would be constructed at Bellows AFS. There is a significant unmet demand for recreational lodging for military personnel at Bellows AFS. If the proposed project is not completed, military personnel would be denied reservations due to the limited number of cabins, thereby impeding the installation's ability to fulfill its mission of *enhancing combat effectiveness by delivering secure, affordable, and customer-focused recreational services*.

MITIGATIONS

Measures to be implemented as part of the proposed action to reduce environmental impacts are summarized below:

- Construction best management practices would be employed to reduce construction-related impacts to air quality, geology and soils, hazardous materials and hazardous waste, noise, safety and health, and surface water resources.
- To minimize light attraction and the risk of causing a "take" of listed seabirds, the proposed project would follow the lighting design principles outlined in Section 3.2.3 of the EA.
- To mitigate the potential for adverse impacts to cultural resources, a data recovery program would be developed and finalized in consultation with the SHPD prior to commencement of ground disturbing activities. The Draft EA conducted a pre-construction archaeological survey of the entire footprint of the original proposed 48 units. With the decision by the Air Force to only construct up to 16 units, based on public input, the footprint will now be significantly smaller in size; thus the potential for adverse impacts to cultural resources will be greatly reduced, if the project footprint is confined to the existing WWII era runway, where the soil has already been graded, disturbed and removed beneath the surface. Data recovery excavations would be designed to expose relatively wide areas of the traditional Hawaiian land surface in an effort to record the spatial pattern and ages of features along with the distribution of cultural materials within, around, and between them. All data recovery activities would be completed prior to the

commencement of construction. An archaeological monitor would also be present during construction for the duration of ground disturbing activities.

INTERAGENCY AND INTERGOVERNMENTAL COORDINATION PLANNING AND PUBLIC REVIEW

The Interagency and Intergovernmental Coordination for Environmental Planning (IICEP) process was conducted for 30 days commencing December 29, 2008. A Notice of Availability for the Draft EA was published in the Honolulu Advertiser and the Star-Bulletin on March 30, 2009. That notice announced a 30-day public comment period for the Draft EA beginning March 31, 2009 and ending April 30, 2009. Due to public interest in the Draft EA, the Air Force subsequently extended the public comment period to May 30, 2009. All comments received during the public comment period are addressed in the Final EA.

FINDING OF NO SIGNIFICANT IMPACT

Based on the analysis of environmental affects presented in the EA, I conclude that, 1) there would be no adverse impacts associated with implementation of the Proposed Action that can not be mitigated to a level of non-significance, 2) that preparation of an Environmental Impact Statement is not necessary, and 3) that a Finding of No Significant Impact is appropriate. The EA was prepared in accordance with the NEPA of 1969, as amended (42 U.S.C. § 4321-4374), the CEQ regulations implementing the procedural provisions of NEPA (40 CFR Parts 1500-1508), and Air Force policy and procedures (32 CFR Part 989), and is herein incorporated by reference.



KENNETH S. WILSBACH
Brigadier General, USAF
Commander, 18th Wing



Date

COVER SHEET
FINAL ENVIRONMENTAL ASSESSMENT
CONSTRUCTION OF NEW RECREATIONAL LODGING
BELLOWS AIR FORCE STATION, O`AHU, HAWAII

- a. **Lead Agency:** United States Air Force (Air Force)
- b. **Proposed Action:** Construction of New Recreational Lodging at Bellows Air Force Station (AFS), O`ahu, Hawai`i
- c. **Inquiries on this document may be directed to:** Ms. Tiffany Patrick, 15 CES/CEVP, Environmental Planning Element, 75 H Street, Hickam Air Force Base, O`ahu, Hawai`i 96853-5233, (808) 449-3197, tiffany.patrick@hickam.af.mil
- d. **Designation:** Final Environmental Assessment (EA)
- e. **Abstract:** This Final EA evaluates the potential environmental consequences associated with the proposed construction of new recreational lodging at Bellows AFS, O`ahu, Hawai`i. This Final EA has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code Sections 4321-4374), the Council on Environmental Quality regulations implementing the procedural provisions of NEPA (40 Code of Federal Regulations [CFR] Parts 1500–1508), and Air Force policy and procedures (32 CFR Part 989).

The proposed action is to construct up to 48 additional recreational lodging units at Bellows AFS. Lodging units would be constructed in multi-unit one- to two-story buildings with individual units ranging from approximately 600 to 750 square feet each. The no-action alternative, under which no additional recreational lodging units would be constructed at Bellows AFS, has also been examined. In addition, three proposed alternative actions were considered but not carried forward for reasons identified in this document.

The environmental impacts of the proposed action and no-alternative are summarized below:

Proposed Action. The proposed action would construct up to 48 additional recreational lodging units and supporting utilities and infrastructure at Bellows AFS. No impacts are expected for biological resources, land use and ownership, natural hazards, or socioeconomics. Long-term positive impacts are expected for recreational resources. Short-term adverse construction-related impacts to air quality, geology and soils, hazardous materials and hazardous waste, noise, safety and health, visual resources, and water resources are possible during implementation of the proposed action. However, best management practices to be implemented during construction would reduce these impacts.

Subsurface cultural resources consisting of fire-pits and associated cooking stones, and small collections of fish bone and marine shells dating to the traditional Hawaiian period were identified in the northeastern end of the proposed project area. To mitigate impacts to these cultural resources, a data recovery program would be undertaken within this portion of the project area prior to the commencement of construction.

No-Action Alternative. Under this alternative, no additional recreational lodging units would be constructed at Bellows AFS. There is a significant unmet demand for recreational lodging for military personnel at Bellows AFS. If the proposed project is not completed, military personnel would be denied reservations due to the limited number of cabins, thereby impeding the installation's ability to fulfill its mission of *enhancing combat effectiveness by delivering secure, affordable, and customer-focused recreational services.*

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Acronyms and Abbreviations

§	Section
AAF	Army Air Field
AFB	Air Force Base
AFS	Air Force Station
Air Force	U.S. Air Force
AOC	Area of Concern
BMP	best management practice
CCH	City and County of Honolulu
CDP	census designated place
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CWA	Clean Water Act of 1992 as amended
CWB	Clean Water Branch
CZM	Coastal Zone Management
dB	Decibel
dBA	Decibel (A-weighted scale)
DBEDT	Department of Business, Economic Development, and Tourism
Det	Detachment
DoD	Department of Defense
DOH	Department of Health, State of Hawaii
EA	environmental assessment
EO	Executive Order
ESA	Endangered Species Act of 1973 as amended
ft ²	square feet
HAR	Hawaii Administrative Rules
HIOSH	Hawaii Occupational Safety and Health
HRS	Hawaii Revised Statutes
IICEP	Interagency and Intergovernmental Coordination for Environmental Planning
INRMP	Integrated Natural Resource Management Plan
IRP	Installation Restoration Program
IWS	individual wastewater system
MCTAB	Marine Corps Training Area Bellows
MEA	Management Emphasis Area
NAAQS	National Ambient Air Quality Standards
NEMA	National Electrical Manufacturers Association
NEPA	National Environmental Policy Act of 1969 as amended
NHPA	National Historic Preservation Act of 1966 as amended
NPDES	National Pollutant Discharge Elimination System
OSHA	Occupational Safety and Health Administration
PM ₁₀	particulate matter with a diameter less than or equal to 10 micrometers
PM ₂₅	particulate matter with a diameter less than or equal to 25 micrometers
ROH	Revised Ordinances of Honolulu
ROI	Region of Influence
SCP	Sustainable Communities Plan
SHPD	State Historic Preservation Division
UFC	Unified Facilities Criteria
UIC	Underground Injection Control

U.S.	United States
U.S.C.	United States Code
USFWS	U.S. Fish and Wildlife Service

1.0 PURPOSE OF AND NEED FOR ACTION

1.1 Introduction

The United States (U.S.) Air Force (Air Force), Detachment (Det) 2, 18th Wing is proposing to construct new recreational lodging units at Bellows Air Force Station (AFS) on the island of O`ahu, Hawai`i. Bellows AFS is located north of the town of Waimanalo on the east side of the island of O`ahu and is included in the military complex identified by Tax Map Key 4-1-015:001. The complex includes Bellows AFS and Marine Corps Training Area Bellows (MCTAB) (Figure 1-1 and Figure 1-2).

This environmental assessment (EA) evaluates the potential environmental impacts associated with the proposed action and the no-action alternative to determine whether significant short-term, long-term, and/or cumulative impacts on the human, natural, or historic environments would occur. In addition, three proposed alternative actions were considered but not carried forward for reasons identified in this document.

1.2 History and Background

Bellows AFS was originally established by a Presidential Executive Order (EO) as Waimanalo Military Reservation in 1917. In the 1930s, the facility was used as a bombing and gunnery range by aircraft based at nearby installations on O`ahu. The reservation was renamed Bellows Field in 1933 in honor of Second Lieutenant Franklin B. Bellows. Bellows Field served as a subpost to Wheeler Army Air Field (AAF) until 1941, when it became a permanent military post. During World War II, Bellows Field served primarily as an auxiliary airfield, with less activity than the airfields at Wheeler AAF and Hickam Air Force Base (AFB). On 26 March 1948, Bellows Field was re-designated as Bellows AFB, and placed on caretaker status in December 1948. In 1958, it was re-designated as Bellows AFS when its runways were closed, ending its status as a potential flying field (15 AW 2007).

A communications transmitter facility was constructed from 1956 through 1958, at the intersection of two runways in the middle of Bellows AFS. In 1994, the transmitter for the Air Force Communications Command was relocated to a Federal Aviation Administration site in Ewa Beach. In 1960, the U.S. Army constructed two Nike-Hercules Antiaircraft Missile sites at Bellows AFS. The Nike-Hercules Missile Battery was operated full time by the Hawaii Army National Guard until the missiles were deactivated in 1970 (15 AW 2007).

The U.S. Marine Corps used a portion of Bellows AFS for a coastal training site (as a tenant of the Air Force) beginning in the early 1950s. In October 1999, 1,074 acres were transferred from the Air Force to Marine Corps Base Hawaii for ownership, responsibility, and control as MCTAB (15 AW 2007).

Currently, Det 2, 18th Wing based out of Kadena Air Base, Japan operates and maintains Bellows AFS as a recreational area for military personnel. The current mission at Bellows AFS is: *enhancing combat effectiveness by delivering secure, affordable, and customer-focused recreational services.*

1.3 Purpose and Need

Bellows AFS cabins are open to all branches of the military, both active duty and retired, and other authorized Department of Defense (DoD) personnel. The military community on the island of O`ahu consists of more than 100,000 military personnel. In addition, military personnel stationed worldwide are authorized use of these facilities. Thus, Bellows AFS is an important asset to military personnel residing within and outside of Hawai`i.

Occupancy rates at Bellows AFS averaged 94 percent between 2000 and 2004 (Evans & Chastain 2005). Reservations are in high demand and can be difficult to obtain. Based on Bellows AFS consumer preference analysis findings and current utilization, the demand for recreational lodging at Bellows AFS is more than double its current 107-cabin capacity.

The purpose of the proposed action is to construct new recreational lodging units at Bellows AFS, thereby providing additional recreational lodging for military personnel. The need arises because the existing recreational cabins are operating at full capacity year round and Bellows AFS is not able to meet its current lodging demand and, therefore, its mission of *enhancing combat effectiveness by delivering secure, affordable, and customer-focused recreational services*.

Bellows AFS consumer preference analysis indicates that patrons have a strong preference for lodging within easy walking distance to the beach, and with ocean views. Delivering customer-focused recreational services would, therefore, dictate that the proposed location for new construction must meet these criteria. Proposed construction must also not displace existing camping areas.

1.4 Summary of Key Environmental Compliance Requirements

1.4.1 National Environmental Policy Act

This document has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code [U.S.C.] Sections §§ 4321-4374), the Council on Environmental Quality (CEQ) regulations for implementing the procedural provisions of NEPA (40 Code of Federal Regulations [CFR] Parts 1500-1508), and Air Force policy and procedures (as promulgated at 32 CFR Part 989).

1.4.2 Integration of Other Environmental Statutes and Regulations

Environmental review and consultation requirements for compliance with other federal environmental statutes and regulations are summarized in Table 1-1.

Table 1-1: Other Environmental Review and Consultation Requirements

Permit or Approval	Description	Regulation(s)	Administrative Authority
CWA § 402 NPDES Permit(s)	§ 402 of the CWA establishes the NPDES program regulating the discharge of pollutants to waters of the United States. NPDES permits are required to authorize discharges of storm water associated with construction activities; discharges of construction dewatering effluent; and discharges of hydrotesting effluent.	§ 402 of CWA (33 U.S.C. 1251 §§ et seq.); HRS 342D; HAR 11-55	DOH CWB
CZM Federal Consistency Determination	All federally proposed or permitted actions within the State of Hawai'i must be evaluated for consistency with the Hawai'i CZM Program.	CZM Act (16 U.S.C. §§ 1451 et seq.); 15 CFR 930; HRS 205A	Office of Planning, DBEDT
ESA Section 7 Consultation	Required for all federal actions to ensure minimization of potential adverse impacts to federally protected species.	ESA (16 U.S.C. § 1531)	USFWS

Permit or Approval	Description	Regulation(s)	Administrative Authority
NHPA Section 106 Consultation	Federal agencies are required to consult with the SHPD to seek ways to avoid, minimize, or mitigate adverse effects of a federal action on historic properties.	NHPA (16 U.S.C. § 470); 36 CFR Part 800	Hawai'i Department of Land and Natural Resources SHPD
CWB	Clean Water Branch	HAR	Hawaii Administrative Rules
CWA	Clean Water Act	HRS	Hawaii Revised Statutes
CZM	Coastal Zone Management	NHPA	National Historic Preservation Act
DBEDT	Department of Business, Economic Development and Tourism	NPDES	National Pollutant Discharge Elimination system
DOH	Department of Health, State of Hawai'i	SHPD	State Historic Preservation Division
ESA	Endangered Species Act	USFWS	U.S. Fish and Wildlife Service

1.5 Interagency and Intergovernmental Coordination for Environmental Planning

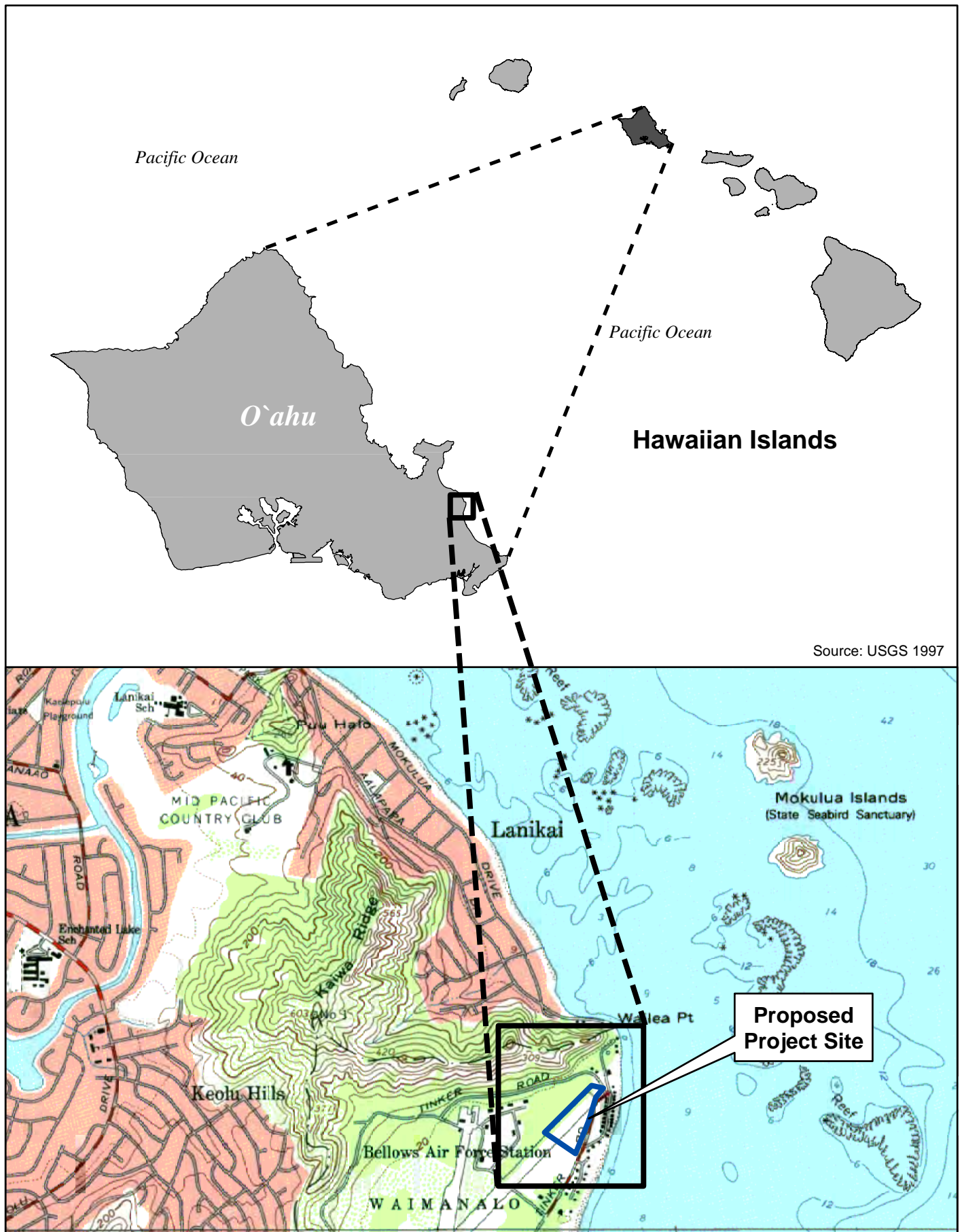
Interagency and Intergovernmental Coordination for Environmental Planning (IICEP) is a process for informing and coordinating with other governmental agencies regarding proposed actions. Through the IICEP process, federal agencies may solicit comments regarding their proposed action(s) from other federal, state, and local agencies having jurisdiction by law or special expertise with respect to a pertinent environmental issue. A copy of the IICEP coordination letter and two enclosures distributed to governmental agencies in December 2008 is included as Appendix A. All comments received during the IICEP process were reviewed for incorporation into the environmental analysis.

1.6 Public Involvement

The Notice of Availability for the Draft EA was published in the *Honolulu Advertiser* and the *Honolulu Star-Bulletin* on March 30, 2009, initiating a 30-day public comment period. Copies of the Draft EA and FONSI were distributed to federal, state, and local agencies, public libraries, and the Waimanalo Neighborhood Board #32 for review and comment; copies were also available upon request.

Air Force representatives attended the Waimanalo Neighborhood Board meeting on April 13, 2009 to update the community on the status of the proposed project and announce that the Draft EA was available for review. At the request of community members, the Air Force extended the public comment period from 30 days to 60 days, and also hosted a public informational meeting at the Army National Guard Training Center on May 13, 2009. Notice of the public comment period extension was made at the close of the neighborhood board meeting on April 13, 2009 and was also advertised in the *Honolulu Star-Bulletin*.

Notice of the public meeting was made through the following channels: (1) the mailing of public meeting announcements to community members that have expressed interest in this project or other Air Force projects (i.e., Neighborhood Board members, Restoration Advisory Board members), (2) telephoning prominent community members, (3) posting the meeting notice at Waimanalo locations with high public visibility (i.e., grocery store, library), and (4) through press releases. The public informational meeting opened with a tour of the proposed site; an informal poster panel session followed. The public meeting was attended by approximately 25 members of the community. Community members provided verbal testimony and written comments at the meeting, and also mailed written comment letters to the Air Force point-of-contact.



Source: USGS 1997

Figure 1-1
Proposed Project Vicinity and Topographic Map
Construction of New Recreational Lodging
Bellows Air Force Station, O`ahu, Hawaii

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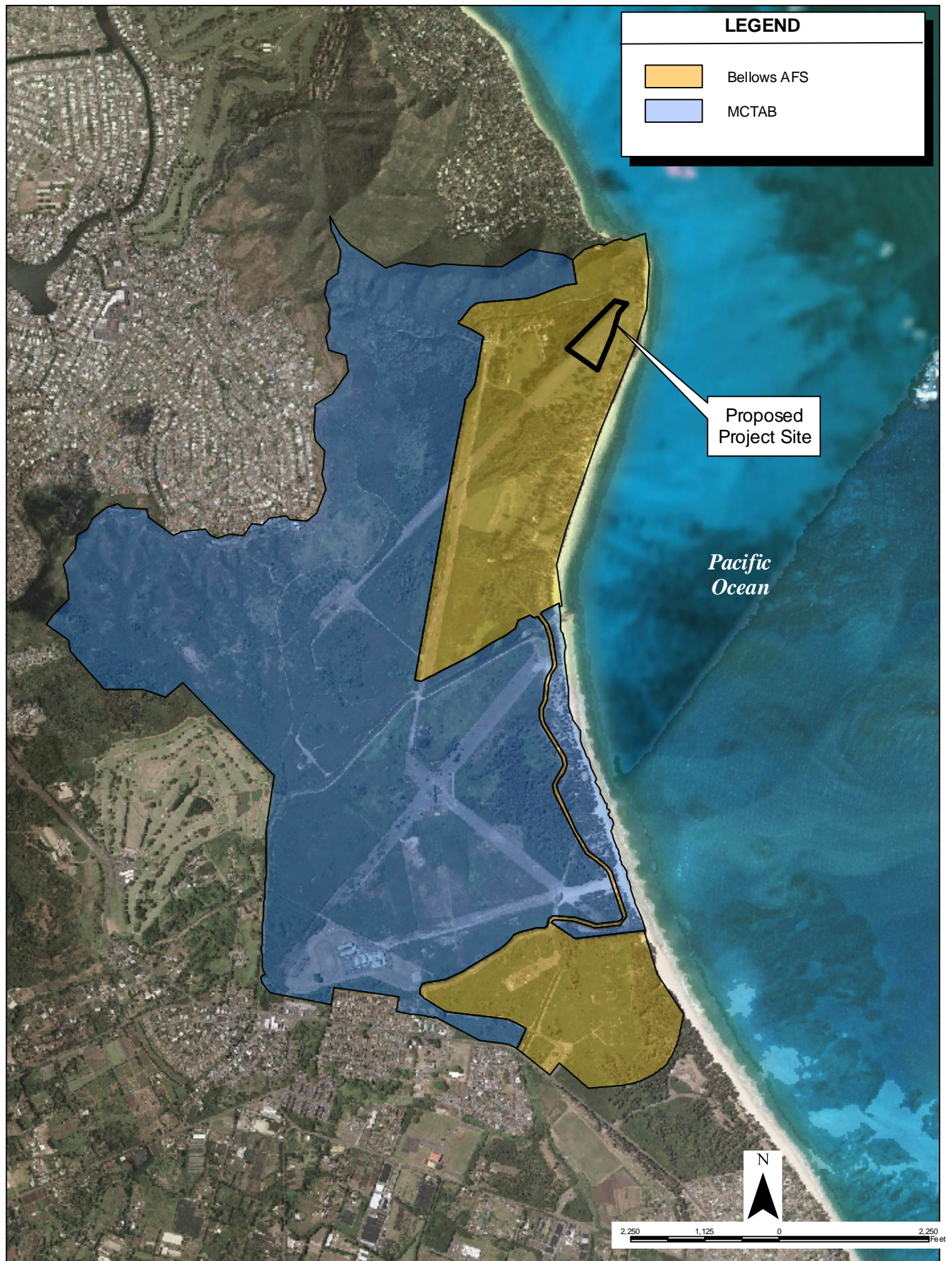


Figure 1-2
Proposed Project Location and Current Land Uses
Bellows Air Force Station, O'ahu, Hawaii

2.0 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

Alternatives evaluated in this EA include the proposed action (Section 2.1) and the no-action alternative (Section 2.2). Three additional alternatives considered during the planning phase, and the rationale for their elimination, are presented in Section 2.4.

2.1 Description of the Proposed Action

The proposed action is to construct up to 48 additional recreational lodging units at Bellows AFS. The units would be constructed west of Tinker Road and the existing 400-series cabins, in the area delineated on Figure 2-1. Proposed lodging units would be constructed in multi-unit one- to two-story buildings with individual units ranging from approximately 600 to 750 square feet (ft²) each. A potential two-story, 8-unit conceptual layout for the lodging units is presented as Figure 2-2 for presentation purposes. Other layouts are also under consideration but would not alter significantly from the design being analyzed in this environmental document (i.e., buildings would not be greater than two-stories in height, size of units would not be significantly outside the range of 600 to 750 ft², the overall footprint for proposed construction would not exceed the proposed project limits, etc.).

Sewer service for the new lodging units would be provided through the use of septic system with a leach field. Thus wastewater system would be designed to provide capacity to meet the projected increase in wastewater demand. Water and electrical service for the new lodging units is available along Pacific Lane and would be extended to the new lodging units underground. A new access road providing access via Tinker Road would be constructed in addition to parking areas. Parking areas would be sized to provide 1 to 2 parking spaces per unit.

The total area of disturbance would be approximately 8 acres. Construction of the proposed lodging units and supporting utilities and infrastructure (i.e., access road and parking areas) would require demolition of the northern end of the former runway within the project limits. The project area would be landscaped upon conclusion of construction activities.

2.2 No-Action Alternative

Under this alternative, no additional recreational lodging units would be constructed at Bellows AFS. There is a significant unmet demand for recreational lodging for military personnel at Bellows AFS. If the proposed project is not completed, military personnel would be denied reservations due to the limited number of cabins. Denial of accommodations could have detrimental effects on the morale and welfare of the personnel who want to use these recreational cabins at this location. In addition, Det 2, 18th Wing would not meet its mission of *enhancing combat effectiveness by delivering secure, affordable, and customer-focused recreational services*.

2.3 Decision to be Made

The decision to be made is whether up to 48 additional proposed lodging units should be constructed at Bellows AFS in order to expand the capacity of this recreational facility for military personnel.

2.4 Alternatives Considered But Not Carried Forward

2.4.1 Alternative 1

This alternative would have constructed the new recreational lodging on a parcel bounded by Pacific Lane and Tinker Road, immediately to the west of the existing 400 series cabins (Figure 2-3). This site offered very good views of the ocean and required minimal new road construction since the site was bounded on all sides by existing roads. However, due to the presence of archaeological resources at this location, the site was eliminated from further consideration.

2.4.2 Alternative 2

This alternative would have constructed the new recreational lodging on the south end of the recreation area, immediately west of the 100 series cabins and east of Tinker Road (see Figure 2-3). The area is currently used for group camping and development of this site would displace group camp sites. None of the units would be beachfront or have ocean views. The area is heavily wooded with rolling terrain and would require leveling. The cost of constructing these units would be higher due to the site work required and the inability to tightly cluster the units. There is also a high probability for discovery of archaeological resources during ground disturbing activities, as cultural deposits have been previously identified in the area. Therefore, this alternative was eliminated from further consideration.

2.4.3 Alternative 3

This alternative would have constructed the new recreational lodging on the north end of the recreation area, immediately west of Tinker Road and east of the abandoned runway (see Figure 2-3). It is a large open area that is relatively flat and used for group camping. None of the units would be beachfront or have ocean views. Development of this site would also displace other existing uses (i.e., group camp sites). Therefore, this alternative was eliminated from further consideration.

2.5 Comparison of Environmental Impacts

The environmental impacts of the proposed action and the no-action alternative are summarized in Table 2-1.

Table 2-1: Comparison of Environmental Impacts

Resource	Proposed Action	No-Action Alternative
Air Quality	Construction activities may result in short-term air quality impacts, however, implementation of construction BMPs would significantly reduce those impacts. Construction activities would not have a measurable long-term effect on the region's ability to achieve and maintain attainment of the NAAQS for criteria pollutants. Air quality impacts would not be significant.	Construction would not occur. No impacts would be anticipated.
Biological Resources	The proposed project area consists of inactive runway and maintained lawn. No federally protected or other special status species are known to use the project area; however, protected seabirds may occur in the project vicinity. Lighting designs to reduce the attraction of seabirds would be incorporated into the project design to mitigate potential impacts.	Construction would not occur. No impacts would be anticipated.
Cultural Resources	An archaeological inventory survey identified subsurface cultural resources consisting of fire-pits and associated cooking stones, and small collections of fish bone and marine shells dating to the traditional Hawaiian period in the northeastern end of the proposed project area. Disturbance of this area would have an adverse impact on Site 50-80-15-4856. To mitigate impacts to this cultural resource, a data recovery program would be developed in consultation with the SHPD. All data recovery activities would be completed prior to the commencement of construction. An archaeological monitor would also be present during construction for the duration of ground disturbing activities. With these mitigation measures, impacts to cultural resources would not be significant.	Construction would not occur. No impacts would be anticipated.

Resource	Proposed Action	No-Action Alternative
Geology and Soils	Short-term impacts to soils would occur as a result of ground disturbance associated with construction activities. Compliance with NPDES permit conditions and implementation of construction BMPs would minimize the potential for erosion. No significant adverse impacts would be anticipated.	Construction would not occur. No impacts would be anticipated.
Hazardous Materials and Hazardous Waste	Hazardous materials and hazardous waste stored/generated during construction activities would be handled in accordance with applicable Federal and State regulations. Implementation of construction BMPs would minimize potential impacts. No significant adverse impacts would be anticipated.	No change in hazardous materials use or hazardous waste generation. No impacts would be anticipated.
Land Use and Ownership	The proposed action is consistent with the State land use designation of Urban district, the CCH zoning district of F-1 Federal and Military Preservation District, and the INRMP Intensive Recreation MEA. The proposed development would also be compatible with adjacent recreational uses, except that the paintball field may be relocated.	No change in land use or ownership. No impacts would be anticipated.
Natural Hazards	The proposed project area is not within a flood hazard area or tsunami evacuation zone. Construction of recreational lodging units would conform to the seismic design criteria contained in UFC 3-310-04, <i>Seismic Design for Buildings</i> . No significant adverse impacts would be anticipated.	Potential effects from natural hazards would not increase from current conditions. No impacts would be anticipated.
Noise	Construction activities may result in short-term impacts to ambient noise levels. To minimize noise impacts, construction activities would be conducted in accordance with State regulations establishing maximum permissible noise exposure levels; noise prevention, control and abatement guidelines; and permit criteria.	No change to the noise environment would occur. No impacts would be anticipated.
Recreational Resources	The proposed action would add up to 48 additional recreational lodging units to the existing cabin inventory, allowing the installation to fulfill its mission.	No additional recreational lodging units would be constructed. Military personnel would be denied reservations due to the limited number of cabins, thereby impeding the installation's ability to fulfill its mission of <i>enhancing combat effectiveness by delivering secure, affordable, and customer-focused recreational services</i> .
Safety and Health	Short-term construction related impacts to safety and health relate to worker safety during construction. The construction workforce would be managed in accordance with applicable OSHA and HIOSH regulations pertaining to worker safety. No significant adverse impacts would be anticipated.	Construction would not occur. No impacts would be anticipated.

Resource	Proposed Action	No-Action Alternative
Socioeconomics and Environmental Justice	Construction of up to 48 additional recreational lodging units would result in a temporary increase in construction employment and add up to seven additional permanent housekeeping positions at Bellows AFS. This would result in a positive impact for employment at Bellows AFS. No significant adverse environmental impacts would be anticipated from implementation of the proposed action; therefore, disproportionate adverse impacts to low-income and minority populations would not be expected.	No change to population, employment, income, or demographics. No impacts would be anticipated.
Utilities and Infrastructure	Water and electrical service for the new lodging units is available at the intersection of Pacific Lane and Tinker Road and would be extended to the new lodging units underground. New septic tank and leach field would be constructed. A new access road providing access from Tinker Road would be constructed in addition to new parking areas.	No change to utilities or infrastructure. No impacts would be anticipated.
Visual Resources	Temporary visual impacts from ground disturbance and equipment staging may occur. Lodging units would be constructed in multi-unit one- to two-story buildings with individual units ranging from approximately 600 to 750 ft ² each. The new recreational lodging units would be more densely clustered than existing cabins, but would have similar floor plans, and would not exceed two-stories in height. The overall appearance of the new recreational lodging would be designed to be compatible with existing cabins. No adverse visual impacts would be anticipated.	No change to the visual quality of the project area. No impacts would be anticipated.
Water Resources	Construction activities may result in short-term impacts to surface water resources, however, compliance with NPDES permit conditions and implementation of construction BMPs would significantly reduce those impacts. The proposed action would construct a septic tank with leach field for on-site treatment of wastewater. The proposed project area is located seaward of the UIC line and groundwater underneath the proposed project area is not considered a potential source of drinking water. Therefore, there is no potential for proposed on-site wastewater disposal practices to adversely impact potable water supplies.	Construction would not occur. No impacts would be anticipated.

BMP	best management practice
CCH	City and County of Honolulu
HIOSH	Hawaii Occupational Safety and Health
INRMP	Integrated Natural Resource Management Plan
MEA	Management Emphasis Area
NAAQS	National Ambient Air Quality Standards
OSHA	Occupational Safety and Health Administration
UFC	Unified Facilities Criteria
UIC	Underground Injection Control

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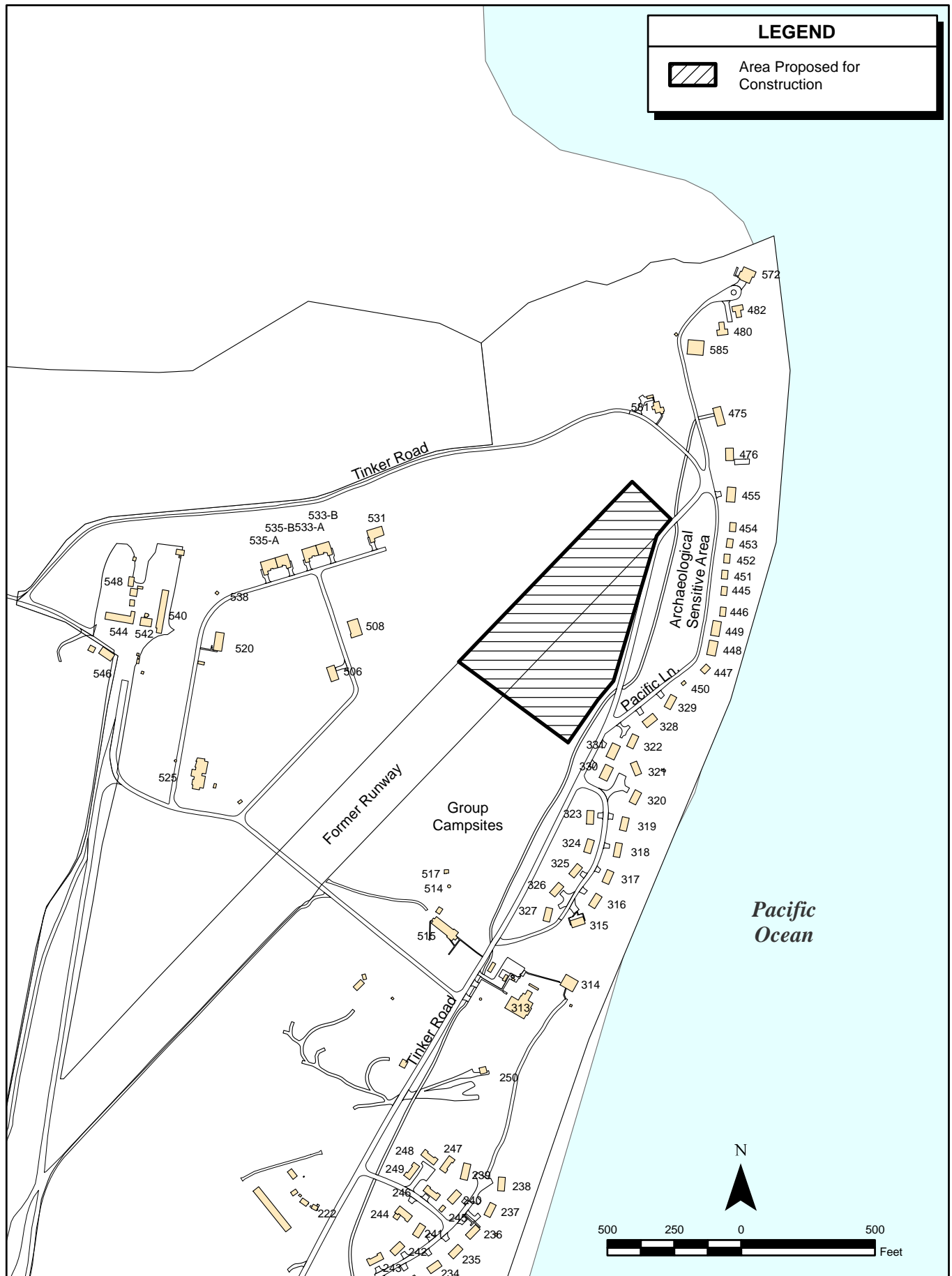


Figure 2-1
Proposed Action
Bellows Air Force Station, O'ahu, Hawaii

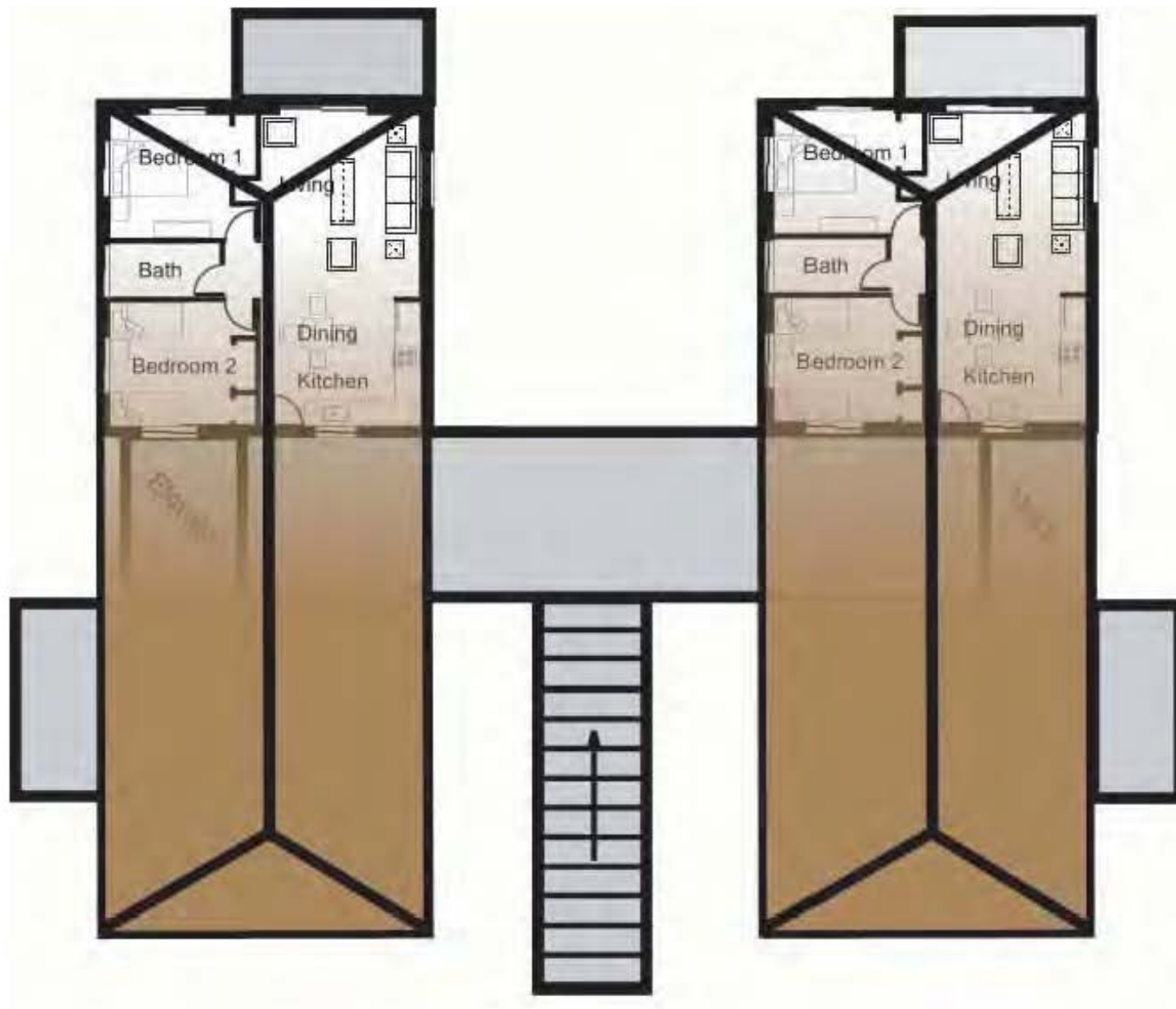


Figure 2-2
Potential Conceptual Layout for
Recreational Lodging
Bellows Air Force Station, O`ahu, Hawaii

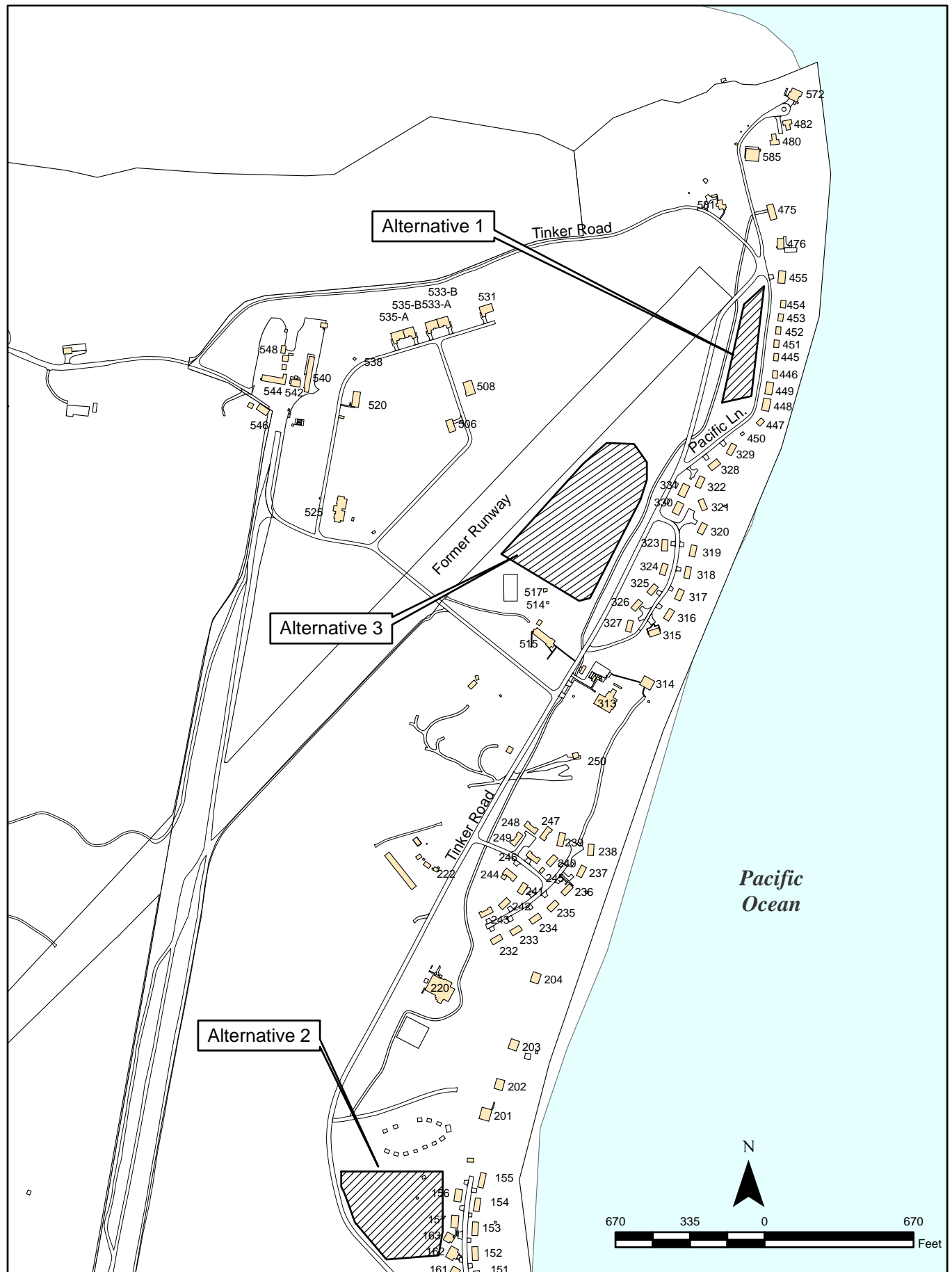


Figure 2-3
Alternative Sites Considered But Not Carried Forward
Bellows Air Force Station, O`ahu, Hawaii

3.0 AFFECTED ENVIRONMENT AND CONSEQUENCES OF THE ALTERNATIVES

This section describes the affected environment associated with the proposed action and the no-action alternative. The affected environment describes the natural and man-made environments, which includes air quality, biological and cultural resources, geology and soils, hazardous materials and hazardous waste, land use and ownership, natural hazards, noise, safety and health, socioeconomics, utilities and infrastructure, visual and water resources. The Region of Influence (ROI) defines the geographical area to be addressed as the affected environment for each resource area potentially affected by the proposed action and the no-action alternative.

3.1 Air Quality

3.1.1 Definition of the Resource

The ROI for air quality is the proposed project site and downwind areas. Ambient air quality refers to the purity of the general outdoor atmosphere. Ambient air quality can be affected by air pollutants produced by mobile sources (i.e., vehicles, aircraft, construction equipment, etc.), as well as by fixed sources (i.e., industrial stacks), which are referred to as “stationary sources.” Significant adverse effects are determined where the proposed action would generate emissions that would exceed national or state ambient air quality standards.

National and Hawai`i Ambient Air Quality Standards. The U.S. Environmental Protection Agency, under the requirements of the 1970 Clean Air Act as amended in 1977 and 1990, has established National Ambient Air Quality Standards (NAAQS) in terms of ambient pollutant concentrations for six contaminants, referred to as criteria pollutants (40 CFR 50). These criteria pollutants are carbon monoxide, nitrogen dioxide, ozone, particulate matter (PM₁₀: diameter ≤ 10 micrometers) and PM_{2.5} (diameter ≤ 2.5 micrometers), lead, and sulfur dioxide. The State of Hawai`i has established its own ambient air quality standards (Hawaii Administrative Rules [HAR] Title 11 Chapter 59-4) that are as strict or, in some cases, stricter than the NAAQS. The State of Hawai`i has also established standards for fugitive dust emissions emanating from construction activities (HAR Title 11, Chapter 60.1-33). These standards prohibit any visible release of fugitive dust from construction sources without taking reasonable precautions.

National Ambient Air Quality Standard Attainment Status. Areas where ambient levels of a criteria pollutant are below the NAAQS are designated as being in “attainment.” Areas where levels of a criteria pollutant equal or exceed the NAAQS are designated as being in “nonattainment.” Where insufficient data exist to determine an area’s attainment status, it is designated unclassifiable or in attainment. In 2007, the State of Hawai`i was in attainment for all criteria pollutants (DOH 2008).

3.1.2 Existing Conditions

Bellows AFS is maintained as a recreational area for military personnel. Emissions from motor vehicles are the primary source of air pollutants in the project vicinity. Vehicular traffic is generally light and concentrations of ambient pollutants are assumed to be well below the federal and state ambient air quality standards.

3.1.3 Consequences of the Proposed Action

Only short-term construction-related impacts to air quality are anticipated with implementation of the proposed action. During construction, potential emission sources that may affect air quality at the project site include (1) fugitive dust emissions from excavation and construction activities, and (2) emissions from diesel and/or gasoline-powered construction equipment and motor vehicles.

Construction vehicles traveling to and from the proposed project area and on-site construction equipment consisting of primarily diesel engines, would contribute to local air pollution. Construction activities may also generate short-term fugitive dust particulate emissions. These sources would be combined with existing emissions from local traffic.

Construction activities would be conducted in accordance with State of Hawai'i air pollution control regulations (HAR 11-60.1) and would employ the proper administrative and engineered controls to reduce air emissions. Dust control measures, such as a dust control (watering) program and covering of soil stockpiles during transport or storage, would be developed and implemented by the construction contractor.

Because levels of criteria pollutants in the City and County of Honolulu are consistently well below federal and state air quality standards (DOH 2008), and because the prevailing trade winds rapidly dissipate pollutants, short-term increases in levels of criteria pollutants at the project area from construction activities are not expected to be significant.

3.1.4 Consequences of the No-Action Alternative

Under the no-action alternative, no construction activities would occur. No additional emission sources would be added; hence there would be no change to air quality. No impact to air quality is anticipated from the no-action alternative.

3.2 Biological Resources

3.2.1 Definition of the Resource

The ROI for biological resources is the proposed project area. Biological resources refer to terrestrial and aquatic species and habitats including native and non-native species of flora and fauna (i.e., vegetation and wildlife), sensitive habitats (i.e., wetlands), and protected species and their habitats. This resource is evaluated to ensure compliance with the Fish and Wildlife Coordination Act (16 U.S.C. §§ 661-667e), the Endangered Species Act (ESA) (16 U.S.C. §§ 1531-1544), and the Migratory Bird Treaty Act (16 U.S.C. §§ 703-712). A determination of significant adverse impact is made where implementation of the proposed action would be likely to result in a "take" of a federally protected species (i.e., would harass, harm, wound, kill, or capture a protected species), and this "take" cannot be minimized or mitigated.

3.2.2 Existing Conditions

The ROI does not include any aquatic species or habitats.

Terrestrial habitats at Bellows AFS consist of non-native vegetation types, including ironwood forest, koa-haole/Christmas berry shrubland, koa-haole shrubland, and mangrove. Areas surrounding the recreational facilities are landscaped with maintained lawns and a variety of common ornamental species. No federally listed plant species are known to occur within the installation boundaries.

Federally listed bird and bat species observed or potentially occurring at Bellows AFS are summarized in Table 3-1.

Table 3-1: Federally Listed Bird and Bat Species Observed or Potentially Occurring at Bellows AFS

Scientific Name	Common Name	Hawaiian Name	Status
<i>Lasiurus cinereus semotus</i>	Hawaiian hoary bat	Ope`pe`a	E
<i>Anas wyvilliana</i>	Hawaiian duck	koloa maoli	E

Scientific Name	Common Name	Hawaiian Name	Status
<i>Fulica americana alai</i>	Hawaiian coot	`alae ke`oke`o	E
<i>Gallinula chloropus sandwichensis</i>	common moorhen	`alae `ula	E
<i>Himantopus mexicanus knudseni</i>	Hawaiian stilt	ae`o	E
<i>Puffinus newelli</i>	Newell's shearwater	`a`o	T

Federal status: E = Endangered; T = Threatened

The project area is located within a highly maintained land management unit consisting of inactive runway and maintained lawn. No federally protected or other special status species are known to use the project area, although the Hawaiian hoary bat may potentially use the area.

Endangered waterbirds such as the Hawaiian duck, Hawaiian coot, common moorhen, and Hawaiian stilt have been observed within the boundaries of Bellows AFS, primarily along the shore and wetland areas of Waimanalo Stream (approximately 0.5 mile from the proposed project area). The Newell's shearwater is also potentially occurring within the boundaries of Bellows AFS, but has not been observed at the proposed project area.

3.2.3 Consequences of the Proposed Action

The project area consists of inactive runway and maintained lawn. No federally protected or other special status species are known to use the proposed project area. As the project will not involve vegetation removal, the action will not affect the Hawaiian hoary bat. The proposed project area is located approximately 0.5 mile from Waimanalo Stream and would have no direct or indirect effects on protected waterbirds or their habitat.

The Newell's shearwater is a migratory seabird. Migratory seabirds can become attracted to outdoor lighting and as a result often fall to the ground where they are injured or killed if not rescued by humans. To minimize and avoid risk of causing a "take" of listed seabirds, the proposed project would follow the following design principles:

- All outdoor lights would be fully shielded or full cut-off light styles;
- Uplighting would be avoided;
- Use of an amber colored or other color (such as blue or green) filters or bulbs would be used where practicable to assist in decreasing risk of seabird attraction;
- Motion detection-activated lights may be utilized, where practicable, to prevent lights from being on for extended periods of time; and
- Locating bright lights near utility wires or other objects that could be difficult for birds to see at night would be avoided.

The following specific lighting would be used where practicable to reduce seabird attraction: (1) low profile bollard lights with louvers would be used for walkway/path lighting, (2) full cut-off low pressure sodium streetlights and fully shielded National Electrical Manufacturers Association (NEMA) lights would be used for street lighting and parking areas, and (3) recessed lights, canister downlights, and eyelid or louvered step lights would be used for architectural lighting.

Unacceptable lighting that would be avoided includes globe fixtures, unshielded carriages, acorn fixtures, drop-lens with exposed bulbs, unshielded streetlights, wall sconces, unshielded or partially shielded floodlights, NEMA security lights, and drop-lens canopy lights.

With implementation of these lighting measures, the Air Force has determined that the proposed project would have “no effect” to any species protected under the ESA. A request for concurrence with this determination was submitted to the U.S. Fish and Wildlife Service (USFWS) in a letter dated June 12, 2009 (Appendix B). The USFWS, in their response dated July 22, 2009 (Appendix B), determined that the action will not affect the Hawaiian hoary bat and listed Hawaiian waterbirds, and may affect, but is not likely to adversely affect, the Newell’s shearwater and listed sea turtles.

3.2.4 Consequences of the No-Action Alternative

Under the no-action alternative, no construction activities would occur and there would be no change to the biological environment within the ROI. No impact to biological resources is anticipated from the no-action alternative.

3.3 Cultural Resources

3.3.1 Definition of the Resource

The ROI for cultural resources is the project area where ground disturbance is likely to occur. Cultural resources are prehistoric and historic sites, structures, districts, artifacts, or any other physical evidence of human activity considered important to a culture, subculture, or community for scientific, traditional, religious, or any other reason. For the purposes of this EA, cultural resources are defined to include prehistoric and historic archaeological sites, historic buildings and structures, and traditional sites and cultural practices.

The primary law governing cultural resources in terms of their treatment in a NEPA analysis is the National Historic Preservation Act (NHPA) of 1966 (16 U.S.C. §§ 470 et seq.). This Act establishes as Federal policy the protection of historic properties in cooperation with other State and local governments. Section 106 of the NHPA directs Federal agencies to consult with the State Historic Preservation Officer in order to identify historic properties their actions could affect; determine whether an adverse effect would occur, and if so, seek ways to avoid, minimize, or mitigate those effects. A determination of significant adverse impact is made where implementation of the proposed action would disturb the integrity of a significant historic property either listed or eligible for listing on the National Register of Historic Places, and this impact cannot be mitigated.

3.3.2 Existing Conditions

The proposed project area is located in close proximity to two archeological sites eligible for listing on the National Register of Historic Places: Site 50-80-15-4856 and Site 50-80-15-4857. Site 50-80-15-4857 is located approximately 200 to 300 meters inland of the proposed project area. Site 50-80-15-4856 is located immediately seaward, however, the southwestern boundary of the site is not well defined. Both sites are known to contain buried traditional Hawaiian cultural deposits providing evidence of habitation activities.

In order to determine the presence or absence of historic resources within the proposed project area, a pre-construction archaeological inventory survey was conducted by *T.S. Dye & Colleagues, Archaeologists, Inc* (T.S. Dye 2009). The survey was conducted in two phases, each of which searched for historic properties by digging backhoe trenches oriented perpendicular to the coastline. During the first phase, 25 trenches were excavated with a total length of 327 meters (1,075 feet).



LEGEND

- Phase I Trench
- Phase II Trench

SOURCE

T.S. Dye & Colleagues,
Archaeologists, Inc.



Not To Scale

Figure 3-1
Backhoe Trenches Excavated for the Phase I
and Phase II Archaeological Inventory Surveys
Bellows Air Force Station, O'ahu, Hawaii

During the second phase, 16 trenches were excavated with a total length of approximately 510 meters (1,673 feet) (Figure 3-1).

Survey results indicate that the northeastern end of the grassed portion of the proposed project area is within Site 50-80-15-4856, a traditional Hawaiian cultural deposit significant for the information on Hawaiian prehistory and history that it has yielded and is likely to yield. Features discovered include fire-pits and associated cooking stones, and small collections of fish bone and marine shells that are likely the remains of foods that were cooked in them. Charcoal obtained from eight of the fire-pits dated to the traditional Hawaiian period. No human remains were discovered.

Backhoe trenches excavated within the footprint of the runway exposed a single pit feature and a paleosol that was the land surface during traditional Hawaiian times, but no cultural layers. These results were consistent with expectations that traditional Hawaiian cultural deposits would likely be absent beneath the runway due to the extensive grading and filling required for runway construction in the early 1940s. A copy of the pre-construction archaeological survey report was submitted to the State Historic Preservation Division (SHPD) and is available for review at the SHPD library.

3.3.3 Consequences of the Proposed Action

An archaeological inventory survey identified subsurface cultural resources consisting of fire-pits and associated cooking stones, and small collections of fish bone and marine shells dating to the traditional Hawaiian period in the northeastern end of the grassed portion of the proposed project area. Disturbance of this area would have an adverse impact on Site 50-80-15-4856.

To mitigate impacts to this cultural resource, a data recovery program would be developed in consultation with the SHPD. Data recovery excavations would be designed to expose relatively wide areas of the traditional Hawaiian land surface in an effort to record the spatial pattern and ages of features along with the distribution of cultural materials within, around, and between them. All data recovery activities would be completed prior to the commencement of construction. An archaeological monitor would also be present during construction for the duration of ground disturbing activities.

If cultural resources including human remains are inadvertently discovered during construction, work in the vicinity of the discovery will stop and the Air Force will take measures to secure the area. If human remains of native Hawaiian origin are inadvertently discovered, the Office of Hawaiian Affairs, the O`ahu Island Burial Council, Hui Mālama I Na Kūpuna `O Hawai`i Nei, and interested parties will be notified and requested to consult in accordance with the Native American Graves Protection and Repatriation Act.

With these mitigation measures, the Air Force has determined that impacts to cultural resources would be less than significant. A request for concurrence with this determination was submitted to the SHPD in a compliance request dated January 20, 2009 (Appendix B). The SHPD, in a letter dated August 26, 2009, concurred with the determination of No Significant Impact (Appendix B).

3.3.4 Consequences of the No-Action Alternative

Under the no-action alternative, no construction activities would occur. No construction-related ground disturbance and no impact to subsurface cultural artifacts or features would occur. No impacts to cultural resources are anticipated from the no-action alternative.

3.4 Geology and Soils

3.4.1 Definition of the Resource

The ROI for geology and soils is the proposed project area. This resource is evaluated in order to assess whether areas proposed for construction may be susceptible to erosion, flooding, or landslide, or have soil properties that limit engineering uses and applications. Significant adverse impacts are determined where soil properties have severe limitations for engineering applications that cannot be overcome through engineering design and/or implementation of best management practices (BMPs).

3.4.2 Existing Conditions

Soils within the ROI are classified as Jaucas sand, 0 to 15 percent slopes (USDA SCS 1972). Jaucas series soils are excessively drained, calcareous soils consisting of wind and water deposited sand derived from coral and seashells. Permeability is rapid and runoff is very slow to slow. The hazard of water erosion is slight, but wind erosion is a severe hazard where vegetation has been removed. Workability is slightly difficult because the soil is loose and lacks stability for use of equipment. Exposed areas may also be difficult to revegetate. Naturally deposited calcareous sands occurring within the project area are overlain by a historic-era coral fill deposit. Within the runway footprint, coral fill is then overlain by approximately 10 centimeters of asphalt. Outside the runway footprint, coral fill is overlain by topsoil and grass lawn.

Per correspondence from the Natural Resources Conservation Service, no Prime or Important Farmland or hydric soils exist within the project area. Engineering uses of the proposed project area for dwellings without basements and local roads are moderate and somewhat limited respectively (Appendix A).

3.4.3 Consequences of the Proposed Action

Only short-term construction-related impacts to soils and geology are anticipated with implementation of the proposed action. Clearing, grading, excavating, and recontouring of soils would remove asphalt and vegetation and expose soil, leaving areas vulnerable to erosion. However, these activities would be of limited duration and impact.

Site-specific BMPs, including erosion control measures, would be developed and implemented by the construction contractor. Erosion control measures may include, but are not limited to, the creation of control swales to channel runoff; establishment of sediment traps, sediment basins, or erosion control berms; installation of silt fences; and temporary stabilization of areas graded and barren of vegetation. Dust control measures, such as a dust control (watering) program and covering of soil stockpiles during transport or storage, would be implemented by the construction contractor to reduce the potential for windblown erosion. Upon project completion, permanent erosion control measures would be applied; areas cleared or graded during construction would be stabilized with perennial vegetation or pavement. No significant impacts to geology or soils are anticipated with implementation of the proposed action.

3.4.4 Consequences of the No-Action Alternative

Under the no-action alternative, no construction activities and no construction-related ground disturbance would occur. No impacts to geology and soils are anticipated from the no-action alternative.

3.5 Hazardous Materials and Hazardous Waste

3.5.1 Definition of the Resource

The ROI for hazardous materials and hazardous wastes is Bellows AFS. For the purpose of the following analysis, the term hazardous materials or hazardous wastes will mean those substances defined by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (42 U.S.C. §§ 9601 et seq.), and the Resource Conservation and Recovery Act (42 U.S.C. §§ 6901–6992). In general, these include substances that, because of their quantity, concentration, or physical, chemical, or toxic characteristics, may present an unreasonable risk to health, safety, and the environment when released.

This resource is evaluated to determine (1) whether areas proposed for development may have been previously impacted by releases of hazardous materials, or (2) whether proposed development would generate any new sources of hazardous materials that would require special handling during construction or operation. Significant adverse impacts are determined where implementation of the proposed action would result in (1) an exposure to, or release of, a quantity of hazardous materials presenting an unacceptable risk to human health or the environment, or (2) a violation of federal, state, or local laws regulating the transportation, storage, handling, use, or disposal of hazardous substances.

3.5.2 Existing Conditions

The Air Force Installation Restoration Program (IRP) is designed to identify, investigate, and cleanup contamination associated with past Air Force activities that resulted in release(s) of CERCLA-defined hazardous substances, pollutants, and contaminants. Bellows AFS has 22 IRP sites and 10 Areas of Concern (AOC). None of the recorded IRP sites or AOCs are known to impact the proposed project area.

3.5.3 Consequences of the Proposed Action

Only short-term construction-related impacts from hazardous materials and hazardous waste are anticipated with implementation of the proposed action. Construction equipment and vehicles contain hazardous materials such as gasoline, diesel, oil, and hydraulic and brake fluids. To minimize the potential for accidental release of these materials into the environment, site-specific BMPs (including procedures for hazardous material storage, handling, and staging; spill prevention and response; waste disposal; and good housekeeping) would be developed and implemented by the construction contractor. These BMPs would greatly reduce the potential for hazardous materials to be released into the environment during construction. No significant impacts related to hazardous materials or hazardous wastes are anticipated with implementation of the proposed action.

3.5.4 Consequences of the No-Action Alternative

Under the no-action alternative, no construction activities would occur and there would be no impacts related to hazardous materials and hazardous waste.

3.6 Land Use and Ownership

3.6.1 Definition of the Resource

This resource is assessed to ensure that proposed land uses are consistent with the objectives of federal, state, and local land use plans and policies. The ROI for land use and ownership is the proposed project area and adjacent areas.

Land use on Oahu is regulated by the State Land Use Commission under Hawaii Revised Statutes (HRS) Chapter 205 and by the City and County of Honolulu (CCH) Land Use Ordinance (Revised Ordinances of Honolulu [ROH], Chapter 21). The Final Integrated Natural Resource Management Plan (INRMP), 2008 – 2012 Update (15 AW 2007) establishes Air Force land management objectives and classifications for Bellows AFS. Significant adverse impacts are determined where proposed uses are determined to be incompatible with federal, state, and local land use plans and policies.

3.6.2 Existing Conditions

The State Land Use Commission regulates land use through classification of State lands into four districts; Urban, Agriculture, Conservation, and Rural (HRS Chapter 205). Bellows AFS is located within the State land use district designated as “Urban.” Per HAR §15-15-18, the Urban district includes lands characterized by “city-like” concentrations of people, structures and urban level of services, in addition to vacant areas for future development.

Bellows AFS has a CCH zoning of “F-1 Federal and Military Preservation District.” The purpose of creating the F-1 Federal and Military Preservation District is to identify areas in military or federal government use and to permit the full range of military or federal government activities. However, should lands be removed from federal jurisdiction, all uses, structures and development standards would be as specified for the P-2 General Preservation District (ROH § 21-3.40).

The INRMP for Bellows AFS (15 AW 2007) designates the proposed project area within the Intensive Recreation Management Emphasis Area (MEA). MEAs were developed to focus and prioritize management efforts to achieve the specific goals and objectives of the INRMP. Support of outdoor recreation activities is the principal purpose of areas designated Intensive Recreation. The Intensive Recreation MEA includes areas used for outdoor recreation facilities (i.e., picnic and water sports areas), other recreation areas with intensive use (i.e., athletic fields, tennis courts, driving ranges), and short-term rental cottages.

Existing uses immediately adjacent to the proposed project area include (1) a paintball field and unmanaged ironwood forest immediately to the west, (2) group campsites to the south, and (3) single-story 1- or 2-bedroom beachfront cabins to the east, between Tinker Road and the shoreline.

3.6.3 Consequences of the Proposed Action

The proposed action to construct up to 48 additional recreational lodging units at Bellows AFS is consistent with the State land use designation of Urban district, the CCH zoning district of F-1 Federal and Military Preservation District, and the INRMP Intensive Recreation MEA. The proposed development would also be compatible with adjacent recreational uses, except that the paintball field may be relocated.

The Koʻolau Poko Sustainable Communities Plan (SCP) outlines general policies for military uses in the project vicinity. The proposed action is consistent with the architectural guidelines pertaining to military uses contained in Section 3.9.4 of the SCP that specifies that building heights should not exceed two to three stories except to meet specific mission-critical design requirements.

Furthermore, based on the Federal Consistency Assessment Form and Draft EA, the Air Force has made the determination that the proposed action has no significant effects on the coastal zone and therefore does not require a CZM Federal Consistency Review. A request for concurrence with this

determination, with supporting documentation, was submitted to the CZM Office in a compliance request dated May 5, 2009 (Appendix B).

3.6.4 Consequences of the No-Action Alternative

Under the no-action alternative, no construction activities would occur. No impacts to land use or ownership are anticipated from the no-action alternative.

3.7 Natural Hazards

3.7.1 Definition of the Resource

The ROI for natural hazards is the proposed project area. This resource is evaluated in order to assess whether proposed construction may be susceptible to natural hazards such as flooding, hurricanes, tsunamis, and earthquakes, and to assess compliance with EO 11988, *Floodplain Management*.

EO 11988 directs Federal agencies to take action to avoid to the extent possible, the long- and short-term adverse impacts associated with the occupancy and modification of floodplains, and to avoid direct or indirect support of floodplain development wherever a practicable alternative exists. Adverse impacts associated with floodplain development include risk of property loss, adverse impacts to human health and safety, and alteration of surface water drainage, which may also affect down-gradient properties. Significant adverse impacts are determined where proposed uses are likely to be adversely impacted by natural hazards, i.e., development in floodplains, over fault lines, etc.

3.7.2 Existing Conditions

Floodplains. The 500-year floodplain is an area with a 0.2 percent chance of inundation in any given year. According to the Flood Insurance Rate Map, the proposed project area is contained within Zone X, indicating that it is outside the 500-year floodplain (FEMA 2004).

Hurricanes. The Hawaiian Islands are seasonally affected by Pacific hurricanes from the late summer to early winter months. These storms generally travel toward the islands from a southerly or southeasterly direction and can deposit large amounts of rain with high winds on all the islands. The storms generally contribute to localized flooding and coastal storm surges.

Tsunamis. Tsunamis are a series of destructive ocean waves generated by seismic activity that could potentially affect all shorelines in Hawai'i. Tsunamis affecting Hawai'i are typically generated in the waters off South America, Japan, Alaska, and the west coast of the United States. Local tsunamis have also been generated by seismic activity on the island of Hawai'i.

The State of Hawai'i Civil Defense establishes tsunami evacuation zones and maps for all coastal areas in Hawai'i. At Bellows AFS, the tsunami evacuation zone includes those areas seaward of Tinker Road. Therefore, the proposed project area is located outside the tsunami evacuation zone.

Earthquakes. Because O'ahu is an older Hawaiian Island, it is not considered particularly prone to seismic activity. O'ahu is listed in Seismic Zone 2A on a scale of 1 to 4 under the International Building Code of 2003. Zone 2A indicates a place that has a low potential for ground motion created by seismic activity.

3.7.3 Consequences of the Proposed Action

The proposed project area is not within a flood hazard area or tsunami evacuation zone. Construction of recreational lodging units would conform to the seismic design criteria contained in the Unified Facilities Criteria (UFC) 3-310-04, *Seismic Design for Buildings* (22 June 2007). This UFC adopts

the seismic design provisions of the International Building Code of 2003 for use in DoD building design. No significant adverse impacts related to natural hazards are anticipated from implementation of the proposed action.

3.7.4 Consequences of the No-Action Alternative

Under the no-action alternative, no construction activities would occur. No impacts related to natural hazards are anticipated from the no-action alternative.

3.8 Noise

3.8.1 Definition of the Resource

The ROI for noise effects is the project area and adjacent areas. Noise is often defined as unwanted sound and is one of the most common environmental issues of concern to the public. A number of factors affect sound, as it is perceived by the human ear. These include the actual level of the sound (or noise), the frequencies involved, the period of exposure to the noise, and changes or fluctuations in the noise levels during exposure.

The accepted unit of measure for noise levels is the decibel (dB) because it reflects the way humans perceive changes in sound amplitude. Sound levels are easily measured, but human response and perception of the wide variability in sound amplitudes is subjective.

Different sounds have different frequency content. When describing sound and its effect on a human population, A-weighted (dBA) sound levels are typically used to account for the response of the human ear. The term “A-weighted” refers to a filtering of the noise signal to emphasize frequencies in the middle of the audible spectrum and to de-emphasize low and high frequencies in a manner corresponding to the way the human ear perceives sound. This filtering network has been established by the American National Standards Institute. The dBA noise level has been found to correlate well with a person’s judgment of the noisiness of different sounds and has been used for many years as a measure of community noise.

The State of Hawai‘i regulates noise exposure in the following statutes and rules: HRS Chapter 342F *Noise Pollution*, HAR §11-46 *Community Noise Control*, and HAR §12-200.1 *Occupational Noise Exposure*. Maximum permissible sound levels for Class A zoning districts (including all areas equivalent to lands zoned residential, preservation, public space, open space or similar type) is 55 dBA during the daytime hours of 7:00 AM to 10:00 PM and 45 dBA between the nighttime hours of 10:00 PM to 7:00 AM. Noise levels shall not exceed the maximum permissible sound levels for more than 10 percent of the time within any 20 minute period, except by permit or variance (HAR §11-46-4).

Significant adverse impacts are determined where noise levels would exceed the greater of (1) permissible sound levels established in State of Hawai‘i noise regulations, or (2) permissible sound levels authorized by the Director of the Department of Health within a noise permit or variance.

3.8.2 Existing Conditions

Bellows AFS has a CCH zoning of “F-1 Federal and Military Preservation District.” Noise studies have not been performed at the project area for the purpose of this EA. Existing noise levels are consistent with residential, preservation, and open space uses and are assumed to be within the State of Hawai‘i community noise exposure guidelines for a Class A zoning district.

3.8.3 Consequences of the Proposed Action

Only short-term construction related noise impacts are anticipated with implementation of the proposed action. Construction equipment employed to implement the proposed action may include trucks (concrete, flat-bed, and/or dump trucks), bulldozers, excavators, backhoes, jack hammers, generators, and air compressors. Noise generated by construction equipment could produce localized noise events of 100 dBA or higher at the construction site. Noise levels at 50 feet typically range between 55 and 88 dBA for equipment such as pick-up or dump trucks, jackhammers, bulldozers, and excavators (Table 3-2). Construction noise would decrease with distance from the project area through divergence, atmospheric absorption, shielding by intervening structures, and absorption and shielding by ground cover. Implementation of the proposed action would not result in any long-term noise impacts.

Table 3-2: Typical Noise Emission Levels for Construction Equipment

Type of Equipment	Noise Level at 50 feet (dBA)
Air Compressor	81
Backhoe	80
Bulldozer	82
Concrete/Grout Pumps	82
Crawler Service Crane (100-Ton)	83
Dump Truck	88
Excavator	85
Front End Loader	80
Generator	81
Jackhammer (Compressed Air)	85
Lift Booms	85
Pick-Up Trucks	55
Power-Actuated Hammers	88
Water Pump	76
Water Truck	55

Source: US DOT 2006; HMMH 2006

To minimize noise impacts, construction activities would be conducted in accordance with State of Hawai'i requirements set forth in HRS §342F *Noise Pollution*, and HRS §11-46 *Community Noise Control*, establishing maximum permissible sound levels from excessive noise sources, noise prevention, control and abatement guidelines, and permit criteria.

The Hawaii Occupational Safety and Health (HIOSH) Division has set the permissible occupational noise exposure at 90 dBA for a continuous 8-hour exposure. Permissible noise exposures for shorter periods are higher, with a maximum exposure of 115 dBA permissible for a duration of 15 minutes or less (HAR §12-200.1). Enforcement of HIOSH occupational noise exposure regulations would be the responsibility of the construction contractor. If workers experience noise exceeding HIOSH standards, administrative or engineering controls shall be implemented. Use of personal protective equipment such as earplugs or muffs may also be required.

To reduce noise exposure for visitors to Bellows AFS, construction activities would be conducted on weekdays and in daytime hours in accordance with HRS §342-F-1. In the event that work occurs after normal working hours (i.e., at night or on weekends), or if permissible noise levels are

exceeded, appropriate permitting and monitoring as well as development and implementation of administrative and engineering controls shall be employed.

3.8.4 Consequences of the No-Action Alternative

Under the no-action alternative, no construction activities would occur. No noise impacts are anticipated from the no-action alternative.

3.9 Recreational Resources

3.9.1 Definition of the Resource

The ROI for recreational resources is Bellows AFS. Evaluation of this resource is of particular importance for this EA, as the availability and quality of recreational resources at Bellows AFS impacts its ability to fulfill its mission of *enhancing combat effectiveness by delivering secure, affordable, and customer-focused recreational services*. A determination of significant adverse impact is made where implementation of the proposed action would result in unacceptable changes in recreational access and use that would prevent the Air Force from fulfilling its mission at Bellows AFS.

3.9.2 Existing Conditions

Existing recreational resources at Bellows AFS include 3 miles of beach, 107 cabins, 56 individual camp sites, 6 group campsites, 3 picnic pavilions, 24 picnic areas, tennis courts, volleyball courts, a basketball court, an Army and Air Force exchange services, a snack bar, an equipment rental center, a paintball course, a driving range, and a miniature golf course.

The cabins are all located 500 feet from the ocean, which stretches the entire length of the recreation area. Occupancy rates for the cabins averaged 94 percent between 2000 and 2004 (Evans & Chastain 2005). Reservations are in high demand and can be difficult to obtain. Based on Bellows AFS consumer preference analysis findings and current utilization, the demand for recreational lodging at Bellows AFS is more than double its current 107-cabin capacity.

3.9.3 Consequences of the Proposed Action

The proposed action would add up to 48 additional recreational lodging units to the existing inventory of cabins at Bellows AFS, thereby enhancing the installation's ability to fulfill its mission. Construction of the recreational lodging units may require relocation of the adjacent paintball field.

3.9.4 Consequences of the No-Action Alternative

Under the no-action alternative, no additional recreational lodging units would be constructed at Bellows AFS. There is presently a significant unmet demand for recreational lodging for military personnel at Bellows AFS. Under the no-action alternative, military personnel would be denied reservations due to the limited number of cabins, thereby impeding the installation's ability to fulfill its mission of *enhancing combat effectiveness by delivering secure, affordable, and customer-focused recreational services*.

3.10 Safety and Health

3.10.1 Definition of the Resource

Occupational Safety and Health Administration (OSHA) regulations (29 CFR Parts 1910 and 1926) set forth safety and health requirements that extend to all U.S. employers and employees. Activities that expose workers to health-threatening situations, such as handling asbestos, exposure to noise or lead dust, and operating heavy equipment, must comply with OSHA regulations. The assessment of

safety and health considers activities, occurrences, or operations that have the potential to affect the safety and health of workers during construction or operation of the proposed development. Impacts to users of nearby recreational areas or cabins who may be exposed to construction-related noise, traffic, and dust, are also considered. A determination of significant adverse impact is made where implementation of the proposed action would result in unacceptable risks for construction workers or the general public to suffer personal injury.

3.10.2 Existing Conditions

No existing public safety and health concerns are associated with current uses at the proposed project area.

3.10.3 Consequences of the Proposed Action

Short-term construction related impacts to safety and health relate to worker safety during construction. Health and safety issues for construction workers relate to the operation of construction equipment; occupational noise; fugitive dust; management of vehicular traffic within the work zone; heavy lifting; slips, trips, and falls while working on uneven terrain; and exposure to heat and biological exposure (bites, stings, and allergens).

The safety and health of workers during construction would be the responsibility of the construction contractor and would conform to OSHA requirements. BMPs that would be implemented to address air quality and occupational noise exposure at the construction site are presented in Sections 3.1.3 and 3.8.3, respectively.

3.10.4 Consequences of the No-Action Alternative

Under the no-action alternative, no construction activities would occur. No impacts to safety and health are anticipated from the no-action alternative.

3.11 Socioeconomics and Environmental Justice

3.11.1 Definition of the Resource

The information presented in this section is used to determine whether any significant socioeconomic impacts would result from implementation of the proposed action or alternative, or whether any minority or low-income population would experience disproportionately high or adverse impacts from the proposed project per the EO 12898 on Environmental Justice.

EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* directs Federal agencies to identify and address disproportionately high and adverse effects of Federal projects on the health or environment of minority and low-income populations to the greatest extent practicable and permitted by law.

The CEQ has issued guidance on compliance with EO 12898, entitled *Environmental Justice, Guidance Under the National Environmental Policy Act* (CEQ 1997). Per CEQ, minority populations should be identified where either (1) the minority population of the affected area exceeds 50 percent or (2) the minority population percentage of the affected area is meaningfully greater than the minority population percentage of the general population. Minorities are defined as members of the following population groups: American Indian or Alaskan Native; Asian or Pacific Islander; Black, not of Hispanic origin; or Hispanic. U.S. Census Bureau poverty status data are used to identify low-income populations. Poverty status is assigned to individuals and families whose income is below the poverty threshold appropriate for that person's family size and composition, as reported in the 2000 Census of Population and Housing.

The ROI for the evaluation of socioeconomic impacts includes Bellows AFS and the adjacent census designated places (CDPs) of Kailua, Waimanalo, and Waimanalo Beach. A determination of significant adverse impact is made where implementation of the proposed action would result in disproportionately high or adverse impact to a minority and/or low income population.

3.11.2 Existing Conditions

Bellows AFS. Approximately 75 personnel are presently employed at Bellows AFS, including approximately 26 housekeepers and seven reservationists supporting cabin rental operations. Permanent residents include the base commander and other permanent military members.

Surrounding Communities. Table 3-3 summarizes the demographic and income characteristics of residents in the surrounding communities of Kailua, Waimanalo, and Waimanalo Beach.

Table 3-3: Demographic and Income Characteristics

Characteristic	Kailua CDP		Waimanalo CDP		Waimanalo Beach CDP	
	No.	Percent	No.	Percent	No.	Percent
Population	36,513		3,664		4,271	
Ethnicity						
American Indian/Alaska Native	109	0.3	5	0.1	10	0.2
Asian	7,709	21.1	982	26.8	228	5.3
Black or African American	277	0.8	6	0.2	4	0.1
Native Hawaiian/Pacific Islander	2,947	8.1	906	24.7	2,024	47.4
Caucasian	16,008	43.8	397	10.8	554	13.0
Other Ethnicity	338	0.9	12	0.3	27	0.6
More than one Ethnic Group	9,125	25.0	1,356	37.0	1,424	33.3
Hispanic or Latino (of any race)	2,228	6.1	380	10.4	277	6.5
Income						
Median Family Income	\$79,118		\$43,347		\$57,281	
Per capita income	\$29,299		\$12,493		\$16,089	
Poverty Status in 1999						
Families below poverty level	312	3.3	45	5.9	47	5.5
Individuals below poverty level	1,972	5.4	296	8.1	358	8.5

Source: U.S. Census Bureau, 2000 Census of Population and Housing (U.S. Census Bureau 2007)

Per CEQ guidance (CEQ 1997), minority populations are present in the Waimanalo and Waimanalo Beach CDPs, as greater than 50 percent of the population are identified as American Indian or Alaskan Native; Asian; Black or African American; Native Hawaiian or Pacific Islander; or Hispanic. Poverty rates within the ROI are below the national averages of 9.2 percent of families living below poverty level and 12.4 percent of individuals living below poverty level. Therefore, a low-income population is determined to not be present within the ROI.

3.11.3 Consequences of the Proposed Action

Bellows AFS. Implementation of the proposed action would result in a temporary increase in construction employment at Bellows AFS and add up to 48 recreational lodging units to the lodging inventory. The incremental income to be generated by the proposed construction is projected to

generate an internal rate of return of 7.124 percent and will payback the investment within 16 years (Evans & Chastain 2005).

Based on current staffing, one housekeeper is needed for every seven additional lodging units. Assuming a net addition of 48 units, approximately seven additional housekeepers would need to be employed at Bellows AFS to support cabin operations at full-build. No adverse socioeconomic impacts are anticipated with implementation of the proposed action.

Surrounding Communities. Implementation of the proposed action is not anticipated to have a significant effect on the employment, income, or demographics of the surrounding communities of Kailua, Waimanalo, or Waimanalo Beach.

For compliance with EO 12898, a determination must be made as to whether minority or low-income populations are subject to disproportionately high and adverse effects from Federal projects. Based on the analysis conducted for this EA, it was determined that activities associated with the implementation of the proposed action would not have significant adverse impacts on any of the resources analyzed. Because no significant adverse impacts have been identified for any of the resources analyzed, a disproportionately high and adverse effect to low-income and minority populations would not be expected.

3.11.4 Consequences of the No-Action Alternative

Under the no-action alternative, no construction activities would occur and there would be no change to employment, income, or demographics within the ROI.

3.12 Utilities and Infrastructure

3.12.1 Definition of the Resource

This section includes information related to water, wastewater, electrical utilities, and other supporting infrastructure (i.e., roads). This resource is evaluated to determine whether upgrades or extensions to existing utilities and infrastructure are required to support proposed development. The ROI for utilities and infrastructure includes the roadways, facilities, and utility distribution lines servicing the proposed project area. A determination of significant adverse effect is made where the projected increase in demand for a utility or infrastructure would exceed the planned capacity for that utility or infrastructure.

3.12.2 Existing Conditions

Access to Bellows AFS is via the main entrance gate on Kalanianaʻole Highway. The proposed project area can be accessed via Tinker Road and/or via the inactive runway that now supports limited vehicular access for Bellows personnel and parking for patrons utilizing the group campsites and paintball field.

Water and electrical service for the proposed project area is available at the intersection of Pacific Lane and Tinker Road. No existing sewer mains are present in the proposed project area.

3.12.3 Consequences of the Proposed Action

Sewer service for the new lodging units would be provided through the use of septic systems with leach field. Development of individual wastewater systems (IWS), such as septic tanks and leach fields, must conform to the requirements of HAR 11-62, *Wastewater Systems*. Key requirements that must be met include (1) the total wastewater flow from the development would not exceed 15,000 gallons per day, (2) the total wastewater flow into each IWS would not exceed 1,000 gallons

per day, and (3) 10,000 square feet of usable land area would be available for each IWS. Wastewater plans are subject to the review and approval of the Director of the Department of Health (DOH). Upon commencement of design, the Air Force would coordinate design of the IWS with the DOH Wastewater Branch to ensure compliance with HAR Chapter 11-62. The IWS would be designed to provide capacity to meet the projected increase in wastewater demand, such that no adverse impacts would be anticipated.

Water and electrical service for the new lodging units is available at the intersection of Pacific Lane and Tinker Road and would be extended to the new lodging units underground. Per correspondence from the Board of Water Supply dated January 22, 2009, the existing water system is presently adequate to accommodate the proposed development (Appendix A). Any generators or boilers (hot water heaters) to be installed during construction of the recreational lodging must be approved through 15 CES/CEVQ prior to installation and start-up/operation.

A new access road providing access from Tinker Road to the lodging units would be constructed in addition to parking areas. Parking areas would be sized to provide 1 to 2 parking spaces per unit. Average annual daily traffic data obtained from the State of Hawaii DOT indicate that approximately 17,675 vehicles per day travel on Kalanianaʻole Highway in the vicinity of the main entrance to Bellows AFS (DOT 2009). Assuming that guests would use two vehicles per lodging unit, and that guests would make one round-trip excursion from Bellows AFS each day, the proposed development would increase traffic on Kalanianaʻole Highway by 192 vehicles. This would result in an approximately 1 percent increase in traffic on Kalanianaʻole Highway. This level of traffic increase is expected to be less than significant.

3.12.4 Consequences of the No-Action Alternative

Under the no-action alternative, no construction activities would occur and there would be no change to utilities and infrastructure within the ROI.

3.13 Visual Resources

3.13.1 Definition of the Resource

Visual resources are the aggregate of characteristic features imparting visually aesthetic qualities to a natural, rural, or urban environment. The ROI for visual resources is the proposed project area. A determination of significant adverse impact is made (1) where the proposed action or alternative would substantially alter the views or scenic qualities of publicly recognized vistas, view sheds, or features, or (2) where proposed uses would be incompatible with the existing landscape and development plans for the area.

3.13.2 Existing Conditions

The proposed project area consists of inactive runway and maintained lawn. Surrounding areas include recreational areas, open space, and low-density accommodations. A paintball field and unmanaged ironwood forest occupy the area immediately to the west. Group campsites are located to the south. A line of single-story one- or two-bedroom beachfront cabins with single or duplex floor plans are located to the east, between Tinker Road and the shoreline.

3.13.3 Consequences of the Proposed Action

Temporary visual impacts from ground disturbance and equipment staging may occur during construction. The proposed action would add up to 48 new recreational lodging units to Bellows AFS. Proposed lodging units would be constructed in multi-unit one- to two-story buildings with individual units ranging from approximately 600 to 750 ft² each. The new recreational lodging units

would be more densely clustered than existing cabins, but would have similar floor plans, and would not exceed two-stories in height. The overall appearance of the new recreational lodging would be designed to be compatible with existing cabins such that no adverse visual impacts would be anticipated.

3.13.4 Consequences of the No-Action Alternative

Under the no-action alternative, no construction activities would occur and there would be no change to the visual quality of the ROI.

3.14 Water Resources

3.14.1 Definition of the Resource

This section describes the surface water and groundwater resources occurring within the ROI. Surface water includes lakes, streams and drainage ways, and near-shore coastal waters. Groundwater includes water present in aquifers (perched, unconfined, confined, or artesian). The ROI for water resources includes the surface water bodies, streams, and drainage features identified within or downgradient of the proposed project area and the underlying aquifer.

Surface water resources in the State of Hawai'i are regulated under the Clean Water Act (CWA) as amended (33 U.S.C. §§ 1251 et seq.); HRS 342D, *Water Pollution Control*; HAR 11-54, *Water Quality Standards*; and HAR 11-55, *Water Pollution Control*. The State's underground injection control (UIC) program developed to protect the quality of the state's underground sources of drinking water from pollution is established within HAR 11-23, *Underground Injection Control*. A determination of significant adverse impact is made where implementation of the proposed action would result in discharge of pollutants into State waters, including underground resources, at concentrations exceeding thresholds established under the CWA and/or State statutes.

3.14.2 Existing Conditions

Surface Water. No surface water resources are located within the proposed project area. On-site storm water infiltrates and/or drains from the project area via sheet flow toward the Pacific Ocean.

Groundwater. Groundwater beneath the proposed project area occurs in two distinct aquifers within the Waimanalo Aquifer System of the Windward Aquifer Sector. The upper aquifer is identified with the aquifer code 30604116. The aquifer is classified as a basal aquifer containing fresh water in contact with seawater that is unconfined in sedimentary non-volcanic lithology. The groundwater status code (12211) indicates that the aquifer is an ecologically important, low salinity groundwater resource that is irreplaceable and has a high vulnerability to contamination (Mink and Lau 1992).

The lower aquifer is identified with the aquifer code 30604122. The aquifer is classified as a basal aquifer containing fresh water in contact with seawater that is confined in dike compartments. The groundwater status code (11113) indicates that the aquifer is a fresh water resource that is irreplaceable and has a low vulnerability to contamination (Mink and Lau 1992).

The State of Hawai'i UIC program was established by the State of Hawai'i DOH Safe Drinking Water Branch to protect the quality of underground sources of drinking water. As part of this program, a UIC line was delineated on maps for each island. Groundwater inland of this line is considered to be a potential source of drinking water. A review of the UIC map for the Island of O'ahu determined that the proposed project area is located seaward of the UIC line. Therefore, groundwater underneath the proposed project area is not considered a potential source of drinking water.

3.14.3 Consequences of the Proposed Action

No significant adverse impacts to surface waters or groundwater are anticipated from construction or operation of the proposed recreational lodging units. Proposed construction would disturb greater than 1 acre and would, therefore, be regulated under a National Pollutant Discharge Elimination System (NPDES) General Permit authorizing discharges of storm water associated with construction activities. Permit conditions would specify site-specific BMPs to be implemented during construction in order to prevent degradation of surface water quality. Site-specific BMPs to control the discharge of sediment and other pollutants into surface waters would include procedures and measures for erosion control; hazardous material storage, handling, and staging; spill prevention and response; waste disposal; and material management practices (i.e., good housekeeping measures). Implementation of these site-specific BMPs would reduce the potential for pollutants to be introduced to surface waters, including storm water runoff.

The proposed action would construct an IWS (i.e., septic tank and leach field) to treat wastewater from up to 48 new recreational lodging units. The proposed project area is located seaward of the UIC line and groundwater underneath the proposed project area is not considered a potential source of drinking water. Therefore, no potential exists for proposed on-site wastewater disposal practices to adversely impact potable water supplies. Development of the IWS for the proposed development would be coordinated with the DOH Wastewater Branch and would conform to the requirements of HAR 11-62, *Wastewater Systems*, such that no adverse impacts would be anticipated.

3.14.4 Consequences of the No-Action Alternative

Under the no-action alternative, no construction activities would occur. No impacts to water resources are anticipated from the no-action alternative.

3.15 Summary of Mitigation Measures

Measures to be implemented as part of the proposed action to reduce environmental impacts are summarized below:

- Construction BMPs would be employed to reduce construction-related impacts to air quality, geology and soils, hazardous materials and hazardous waste, noise, safety and health, and surface water resources.
- To minimize light attraction and the risk of causing a “take” of listed seabirds, the proposed project would follow the lighting design principles outlined in Section 3.2.3.
- To mitigate adverse impacts to cultural resources, a data recovery program would be developed in consultation with the SHPD. Data recovery excavations would be designed to expose relatively wide areas of the traditional Hawaiian land surface in an effort to record the spatial pattern and ages of features along with the distribution of cultural materials within, around, and between them. All data recovery activities would be completed prior to the commencement of construction. An archaeological monitor would also be present during construction for the duration of ground disturbing activities.

4.0 CUMULATIVE AND OTHER IMPACTS

4.1 Cumulative Impacts

Cumulative impacts refer to impacts on the environment that result from the incremental effect of an action when added to other past, present, and reasonably foreseeable future actions. Cumulative impacts can result from individually minor yet collectively significant actions taking place over a period of time. Table 4-1 summarizes other current and future planned actions to be undertaken at Bellows AFS.

Table 4-1: Other Current and Future Planned Actions at Bellows AFS

Fiscal Year (FY)	Planned Action
FY09	<ul style="list-style-type: none"> Construct New CE Shop Renovate Bldg. 220 Reception Area Repair and Expand Bath House Bldg. 517 Repair Recreational Cabins
FY10	<ul style="list-style-type: none"> Utility Pole Removal Install A/C Units Repair Perimeter Fence Replace Main Gate Construct Drop Arm Barrier at 2nd Gate Repair and Expand Bath House Bldgs. 250 and 601 Construct Load Zone Concrete Pad Bldg. 508 Construct Deck Cover Bldg. 220 Repair Recreational Cabins
FY11	<ul style="list-style-type: none"> Repair/Resurface Tennis Court Bldg. 220 Restripe Tinker Road and Bldg. 220 Parking Lot Repave Parking Lots –Pavilions and Shoppette Utility Pole Removal Repair Recreational Cabins
FY12 & Beyond	<ul style="list-style-type: none"> Construct Community Activity Center Repair Recreational Cabins

Bldg. Building

Other current and future planned actions for Bellows AFS involve repair/renovation of existing facilities as well as new construction. Implementation of these planned actions would result in short-term adverse impacts to air quality, geology and soils, hazardous materials and hazardous waste, noise, safety and health, visual resources, and water resources during construction, similar to what was analyzed for the proposed action. These impacts would be temporary and would include implementation of site-specific construction BMPs. No significant adverse cumulative impacts would be anticipated from the incremental addition of the proposed action to the effects of these other current and future planned actions.

4.2 Unavoidable Adverse Impacts

Implementation of the proposed action could result in short-term construction-related impacts to air quality, geology and soils, hazardous materials and hazardous waste, noise, safety and health, visual resources, and water resources. BMPs to be implemented during construction would reduce those impacts to a level of non-significance.

In addition, subsurface cultural resources identified in the northeastern portion of the proposed project area would be disturbed by construction activities. To mitigate impacts to these cultural resources, a data recovery program would be developed in consultation with the SHPD. All data recovery activities would be completed prior to the commencement of construction. With this mitigation measure, the Air Force has determined that impacts to cultural resources would not be significant.

4.3 Compatibility of the Proposed Action with Objectives of Federal and State Land Use Plans and Policies

The proposed action to construct up to 48 additional recreational lodging units at Bellows AFS is consistent with the State land use designation of Urban district, the CCH zoning district of F-1 Federal and Military Preservation District, and the INRMP Intensive Recreation MEA, as discussed in Section 3.6.3. The Air Force has determined that the proposed action has no significant effects on the coastal zone, and therefore does not require a Coastal Zone Management Federal Consistency Review (Appendix B).

4.4 Relationship Between Short-term Use of the Environment and Long-term Productivity

Construction of the proposed action may result in short-term adverse impacts to air quality, geology and soils, hazardous materials and hazardous waste, noise, safety and health, visual resources, and water resources. Implementation of the proposed action would have long-term positive impacts on the recreational resources at Bellows AFS and the ability of the installation to fulfill its mission of *enhancing combat effectiveness by delivering secure, affordable, and customer-focused recreational services*.

4.5 Irreversible and Irretrievable Commitments of Resources

Implementation of the proposed action would result in an irreversible or irretrievable commitment of financial resources, fuel, and other consumable materials required for construction. In addition, subsurface cultural resources identified in the northeastern portion of the proposed project area would be disturbed by construction activities. However, a data recovery program to be undertaken in consultation with the SHPD would mitigate those impacts.

5.0 LIST OF PREPARERS

Individuals contributing to the preparation of the EA are listed below.

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Years of Experience: 14

Mr. Dan Frerich, Staff Environmental Scientist

BA, Environmental Science, Oregon State University, 2000

Years of Experience: 6

6.0 COMMENTS AND RESPONSES

The Notice of Availability for the Draft EA was published in the *Honolulu Advertiser* and the *Honolulu Star-Bulletin* on March 30, 2009, initiating a 30-day public comment period. Copies of the Draft EA were distributed to federal, state, and local agencies, public libraries, and the Waimanalo Neighborhood Board #32 for review and comment, and was also available upon request. At the request of community members, the Air Force subsequently extended the public comment period to 60 days, ending May 30, 2009. All comments received during the 60-day public comment period were considered during preparation of the Final EA. A list of agencies, organizations, and other stakeholders providing comments on the Draft EA is presented in Table 6-1. A compilation of the comments received and the responses to the comments are included in Appendix C. Agencies and individuals that commented on the Draft EA were included on the distribution for the Final EA.

Table 6-1: Comments Received on the Draft EA

State of Hawai'i Agencies
Department of Defense
Engineering Office
Department of Health
Clean Water Branch
Wastewater Branch
Department of Land and Natural Resources
Division of Aquatic Resources
Engineering Division
Commission on Water Resource Management
Office of Conservation & Coastal Lands
Land Division – Oahu District
State Historic Preservation Division
Office of Hawaiian Affairs
City and County of Honolulu Agencies
Board of Water Supply
Department of Design and Construction
Department of Parks and Recreation
Community Organizations & Elected Officials
Ikaika Anderson, Councilmember, District 3
Wilson Kekoa Ho, Waimanalo Neighborhood Board
Andrew M. Jamila, Jr., Waimanalo Neighborhood Board
Beverly Addington, Waimanalo Neighborhood Board
Paul Akau, Kupuna Church
Ryan A. Kalama, Kailua Hawaiian Civic Club
Marvelle Kuulei Laughlin, Waimanalo Hawaiian Civic Club
Kim Kalama, Bellows Restoration Advisory Board (RAB)
Jody Green, Waimanalo Beachlot Association, Bellows RAB
R. Kawehiokalaninui-I-iamamao Kanui-Gill, Native Tenants United
Other Stakeholders
Lucy M. Akau, Waimanalo Resident

Laniwai Kaopuiki, Kailua Resident

Kevin O'Grady, Kailua Resident

Joseph N. A. Ryan, Jr., Waimanalo Resident
--

Robert Loy, Waimanalo Resident

Dale Evans, Waimanalo Resident

Robert and Winifred Simmons, Kailua Residents

7.0 REFERENCES

- 15th Airlift Wing (15 AW). 2007. *Final Integrated Natural Resources Management Plan 2008 – 2012 Update for Hickam AFB, Oahu Bellows AFS, Oahu, Hickam POL Pipeline, Oahu, Kaala AFS, Oahu Koakee*. Hickam AFB. December.
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Appendix A

IICEP Coordination

Appendix A.1
IICEP Coordination Letter and Distribution List



DEPARTMENT OF THE AIR FORCE

15TH AIRLIFT WING

HICKAM AFB, HI

MEMORANDUM FOR DISTRIBUTION

DEC 29 2008

FROM: 15 CES/CEV
75 H Street
Hickam AFB HI 96853-5233

SUBJECT: Solicitation of Input into the Preparation of an Environmental Assessment for the Proposed Construction of New Recreational Lodging at Bellows Air Force Station, O`ahu, Hawaii

1. The 15th Airlift Wing (15 AW) is preparing an Environmental Assessment to address the proposed Construction of New Recreational Lodging at Bellows Air Force Station (AFS), O`ahu, Hawaii. Bellows AFS is currently maintained as a recreational area for active duty and retired military, and other authorized Department of Defense personnel.
2. The purpose of the Proposed Action is to construct up to 48 new recreational lodging units at Bellows AFS, thereby providing additional recreational lodging for military personnel. A detailed Description of the Proposed Action and Alternatives (DOPAA) is included as an attachment to this correspondence.
3. The environmental impact analysis process for the Proposed Action and appropriate Alternatives is being conducted by 15 AW in accordance with the Council on Environmental Quality guidelines pursuant to the requirement of the National Environmental Policy Act of 1969. In accordance with Executive Order 12372, *Intergovernmental Review of Federal Programs*, we request your participation by reviewing the attached DOPAA and solicit your comments concerning the proposal and any potential environmental issues of concern to you.
4. The Environmental Analysis for this proposed action will be available for review in the Draft Environmental Assessment available spring 2009. Separate correspondence will be conducted to fulfill Sect. 106, and CZMA requirements.
4. Please provide comments directly to Ms. Tiffany Patrick, 15 CES/CEVP, Environmental Planning Element, 75 H Street, Hickam AFB, HI 96853-5233 at (808) 449-3197, or email tiffany.patrick@hickam.af.mil within 30 days.


GARY O'DONNELL
Chief, Environmental Planning Element

2 Attachments:

1. Description of the Proposed Action and Alternatives
2. Distribution List

Description of the Proposed Action and Alternatives

**Construction of New Recreational Lodging
Bellows Air Force Station, O`ahu, Hawaii**

United States Air Force

December 2008

COVER SHEET
DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES
CONSTRUCTION OF NEW RECREATIONAL LODGING
BELLOWS AIR FORCE STATION, O`AHU, HAWAII

- a. **Lead Agency:** United States Air Force (Air Force)
- b. **Proposed Action:** Construction of New Recreational Lodging at Bellows Air Force Station (AFS), O`ahu, Hawaii
- c. **Inquiries on this document may be directed to:** Ms. Tiffany Patrick, 15 CES/CEVP, Environmental Planning Element, 75 H Street, Hickam Air Force Base, O`ahu, Hawaii 96853-5233, (808) 449-3197, tiffany.patrick@hickam.af.mil
- d. **Designation:** Description of the Proposed Action and Alternatives (DOPAA)
- e. **Abstract:** An Environmental Assessment (EA) evaluating the proposed construction of new recreational lodging at Bellows AFS, O`ahu, Hawaii is being prepared pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code Sections 4321-4374), the Council on Environmental Quality regulations implementing the procedural provisions of NEPA (40 Code of Federal Regulations [CFR] Parts 1500–1508), and Air Force policy and procedures (32 CFR Part 989).

The Proposed Action is to construct up to 48 additional recreational lodging units at Bellows AFS. Lodging units would be constructed in multi-unit one- to two-story buildings with individual units ranging from approximately 600 to 750 square feet each. The No-Action Alternative, under which no additional recreational lodging units would be constructed at Bellows AFS, is also evaluated. In addition, three proposed alternative actions were considered but not carried forward for reasons identified in this document.

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Acronyms and Abbreviations

§	Section
15 AW	15th Airlift Wing
AAF	Army Air Field
AFB	Air Force Base
AFS	Air Force Station
Air Force	U.S. Air Force
CEQ	Council on Environmental Quality
CES	Civil Engineer Squadron
CEVP	Conservation Resources
CFR	Code of Federal Regulations
CWA	Clean Water Act of 1992 as amended
CWB	Clean Water Branch
CZM	Coastal Zone Management
DBEDT	Department of Business, Economic Development, and Tourism, State of Hawaii
Det	Detachment
DLNR	Department of Land and Natural Resources, State of Hawaii
DoD	Department of Defense
DOH	Department of Health, State of Hawaii
EA	environmental assessment
EO	Executive Order
ESA	Endangered Species Act of 1973 as amended
ft ²	square feet
HAR	Hawaii Administrative Rules
HIARNG	Hawaii Army National Guard
HRS	Hawaii Revised Statutes
IICEP	Interagency and Intergovernmental Coordination for Environmental Planning
MCBH	Marine Corps Base Hawaii
MCTAB	Marine Corps Training Area Bellows
NEPA	National Environmental Policy Act of 1969 as amended
NHPA	National Historic Preservation Act of 1966 as amended
NPDES	National Pollutant Discharge Elimination System
SHPD	State Historic Preservation Division
TMK	Tax Map Key
U.S.	United States
U.S.C.	United States Code
USFWS	U.S. Fish and Wildlife Service
USMC	U.S. Marine Corps

1.0 PURPOSE OF AND NEED FOR ACTION

1.1 Introduction

The United States (U.S.) Air Force (Air Force), Detachment (Det) 2, 18th Wing is proposing to construct new recreational lodging units at Bellows Air Force Station (AFS) on the island of O`ahu, Hawaii. Bellows AFS is located north of the town of Waimanalo on the east side of the island of O`ahu and is included in the military complex identified by Tax Map Key (TMK) 4-1-015:001. The complex includes Bellows AFS and Marine Corps Training Area Bellows (MCTAB) (Figure 1-1 and Figure 1-2).

This environmental assessment (EA) evaluates the potential environmental impacts associated with the proposed action and the no-action alternative to determine if there would be significant short-term, long-term, and/or cumulative impacts on the human, natural, or historic environments. In addition, three proposed alternative actions were considered but not carried forward for reasons identified in this document.

1.2 History and Background

Bellows AFS was originally established by a Presidential Executive Order (EO) as Waimanalo Military Reservation in 1917. In the 1930's, the facility was used as a bombing and gunnery range by aircraft based at nearby installations on O`ahu. The reservation was renamed Bellows Field in 1933 in honor of Second Lieutenant Franklin B. Bellows. Bellows Field served as a subpost to Wheeler Army Air Field (AAF) until 1941, when it became a permanent military post. During World War II, Bellows Field served primarily as an auxiliary airfield, with less activity than the airfields at Wheeler AAF and Hickam Air Force Base (AFB). On 26 March 1948, Bellows Field was re-designated as Bellows AFB, and placed on caretaker status in December 1948. In 1958, it was re-designated as Bellows AFS when its runways were closed, ending its status as a potential flying field (15 AW 2007).

A communications transmitter facility was constructed from 1956 through 1958, at the intersection of two runways in the middle of Bellows AFS. In 1994, the transmitter for the Air Force Communications Command was relocated to a Federal Aviation Administration site in Ewa Beach. In 1960, the U.S. Army constructed two Nike-Hercules Antiaircraft Missile sites at Bellows AFS. The Nike-Hercules Missile Battery was operated full time by the Hawaii Army National Guard (HIARNG) until the missiles were deactivated in 1970 (15 AW 2007).

The U.S. Marine Corp (USMC) used a portion of Bellows AFS for a coastal training site (as a tenant of the Air Force) beginning in the early 1950's. In October 1999, 1,074 acres were transferred from the Air Force to Marine Corps Base Hawaii (MCBH) for ownership, responsibility, and control as MCTAB (15 AW 2007).

Currently, Det 2, 18th Wing based out of Kadena Air Base, Japan operates and maintains Bellows AFS as a recreational area for military personnel. The current mission at Bellows AFS is: *enhancing combat effectiveness by delivering secure, affordable, and customer-focused recreational services.*

1.3 Purpose and Need

Bellows AFS cabins are open to all branches of the military, both active duty and retired, and other authorized Department of Defense (DoD) personnel. The military community on the island of O`ahu consists of more than 100,000 military personnel. In addition, military personnel stationed worldwide are authorized use of these facilities. Thus, Bellows AFS is an important asset to military personnel residing within and outside of Hawaii.

Occupancy rates at Bellows AFS averaged 94 percent between 2000 and 2004 (Evans & Chastain 2005). Reservations are in high demand and can be difficult to obtain. Based on Bellows AFS consumer preference analysis findings and current utilization, the demand for recreational lodging at Bellows AFS is more than double its current 107-cabin capacity.

The purpose of the proposed action is to construct new recreational lodging units at Bellows AFS, thereby providing additional recreational lodging for military personnel. The need arises because the existing recreational cabins are operating at full capacity year round and Bellows AFS is not able to meet its current lodging demand, and therefore, its mission of *enhancing combat effectiveness by delivering secure, affordable, and customer-focused recreational services*.

Bellows AFS consumer preference analysis indicates that patrons have a strong preference for lodging within easy walking distance to the beach, and with ocean views. Delivering customer-focused recreational services would therefore dictate that the proposed location for new construction must meet these criteria. Proposed construction must also not displace existing camping areas.

1.4 Summary of Key Environmental Compliance Requirements

1.4.1 National Environmental Policy Act

This document has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code [U.S.C.] Sections [§§] 4321-4374), the Council on Environmental Quality (CEQ) regulations for implementing the procedural provisions of NEPA (40 Code of Federal Regulations [CFR] Parts 1500-1508), and Air Force Instruction 32-7061, *The Environmental Impact Analysis Process* (as promulgated at 32 CFR Part 989).

1.4.2 Integration of Other Environmental Statutes and Regulations

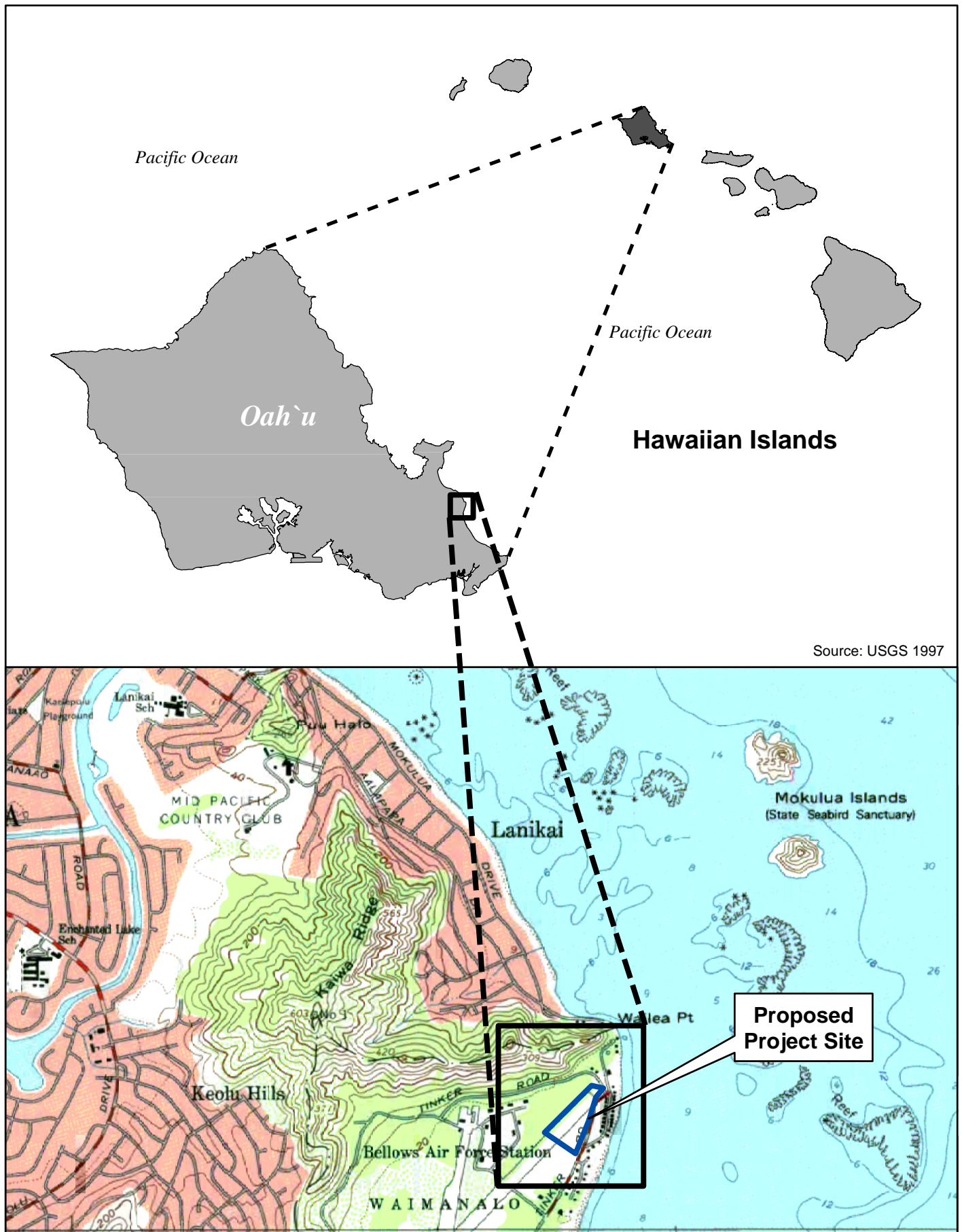
Environmental review and consultation requirements for compliance with other federal environmental statutes and regulations are summarized in Table 1-1.

1.5 Interagency and Intergovernmental Coordination for Environmental Planning

Interagency and Intergovernmental Coordination for Environmental Planning (IICEP) is a process for informing and coordinating with other governmental agencies regarding proposed actions. Through the IICEP process, federal agencies may solicit comments regarding their proposed action(s) from other federal, state, and local agencies having jurisdiction by law or special expertise with respect to a pertinent environmental issue. IICEP coordination letters are being sent to the governmental agencies identified in the enclosed distribution list. All comments received during the IICEP process will be reviewed for incorporation into the environmental analysis.

Table 1-1: Other Environmental Review and Consultation Requirements

Permit or Approval	Description	Regulation(s)	Administrative Authority
CWA § 402 NPDES Permit(s)	§ 402 of the CWA establishes the NPDES program regulating the discharge of pollutants to waters of the U.S. NPDES Permits are required to authorize discharges of storm water associated with construction activities; discharges of construction dewatering effluent; and discharges of hydrotesting effluent.	§ 402 of CWA (33 U.S.C. 1251 §§ et seq.); HRS 342D; HAR 11-55	DOH CWB
CZM Federal Consistency Determination	All federally proposed or permitted actions within the State of Hawaii must be evaluated for consistency with the Hawaii CZM Program.	CZM Act (16 U.S.C. §§ 1451 et seq.); 15 CFR 930; HRS 205A	Office of Planning, DBEDT
ESA Section 7 Consultation	Required for all federal actions to ensure minimization of potential adverse impacts to federally protected species.	ESA (16 U.S.C. § 1531)	USFWS
NHPA Section 106 Consultation	Federal agencies are required to consult with the SHPD to seek ways to avoid, minimize, or mitigate adverse effects of a federal action on historic properties.	NHPA (16 U.S.C. § 470); 36 CFR Part 800	DLNR SHPD
CWA	Clean Water Act	CWB	Clean Water Branch
CZM	Coastal Zone Management	DBEDT	Department of Business, Economic Development and Tourism
DLNR	Department of Land and Natural Resources	ESA	Endangered Species Act
DOH	Department of Health	HRS	Hawaii Revised Statutes
HAR	Hawaii Administrative Rules	SHPD	State Historic Preservation Division
NHPA	National Historic Preservation Act	USFWS	U.S. Fish and Wildlife Service
NPDES	National Pollutant Discharge Elimination System		



Source: USGS 1997

Figure 1-1
Proposed Project Vicinity and Topographic Map
Construction of New Recreational Lodging
Bellows Air Force Station, Oah`u, Hawaii

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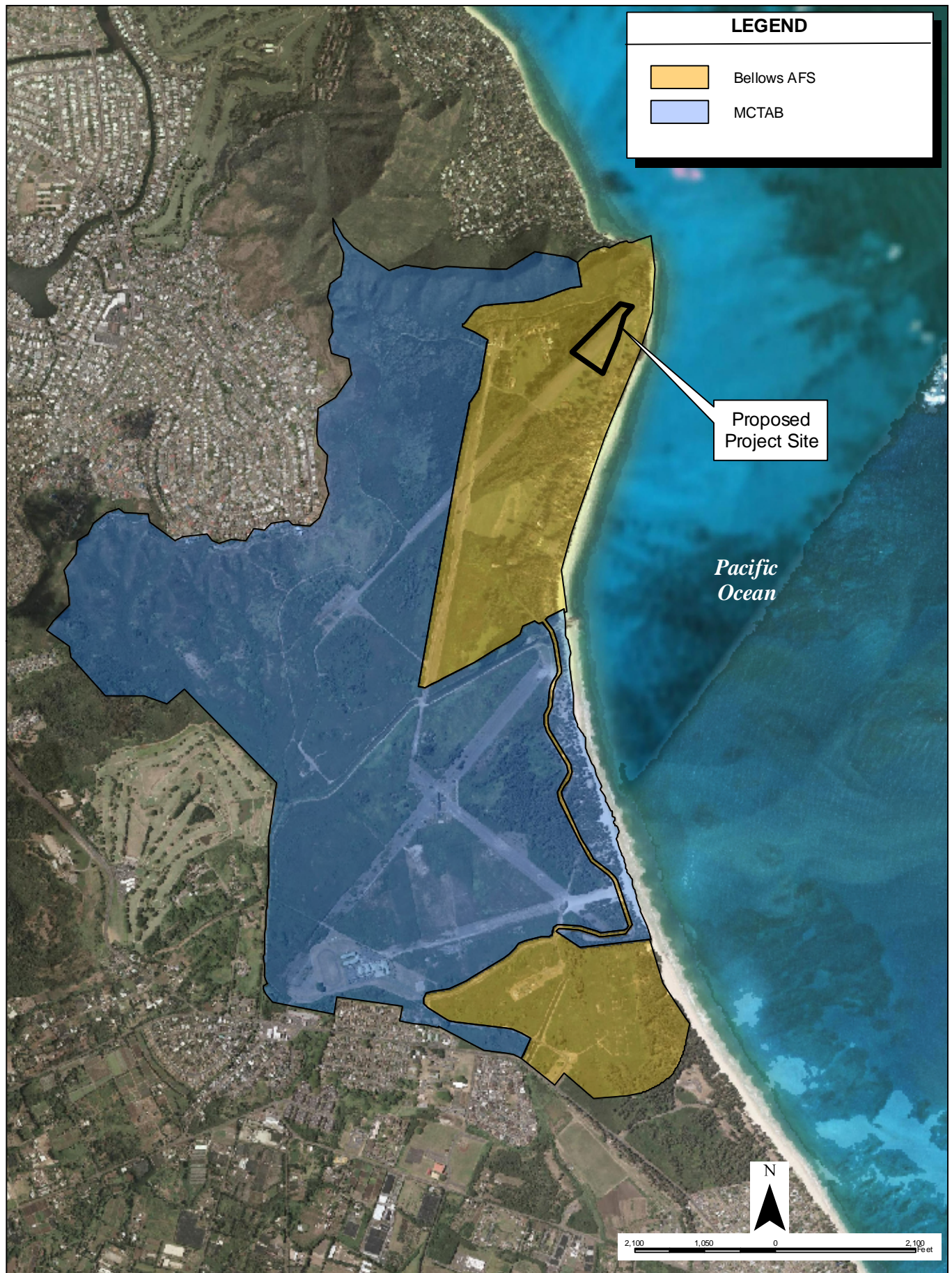


Figure 1-2
Proposed Project Location and Current Land Uses
Bellows Air Force Station, Oah`u, Hawaii

2.0 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

Alternatives evaluated in this EA include the proposed action (Section 2.1) and the no-action alternative (Section 2.2). Three additional alternatives considered during the planning phase, and the rationale for their elimination, are presented in Section 2.4.

2.1 Description of the Proposed Action

The Proposed Action is to construct up to 48 additional recreational lodging units at Bellows AFS. The units would be constructed west of Tinker Road and the existing 400-series cabins, in the area delineated on Figure 2-1. Proposed lodging units would be constructed in multi-unit one- to two-story buildings with individual units ranging from approximately 600 to 750 square feet (ft²) each. A potential two-story, 8-unit conceptual layout for the lodging units is presented as Figure 2-2 for presentation purposes. Other layouts are also under consideration but would not alter significantly from the design being analyzed in this environmental document (i.e., buildings would not be greater than two-stories in height, size of units would not be significantly outside the range of 600 to 750 ft², the overall footprint for proposed construction would not exceed the proposed project limits, etc.).

Sewer service for the new lodging units would be provided through the use of a septic system with a leach field. The leach field would be constructed on approximately 1.5 acres within the grassed area between the former runway and Tinker Road. Water and electrical service for the new lodging units is available along Pacific Lane and would be extended to the new lodging units underground. A new access road providing access via Tinker Road would be constructed in addition to parking areas. Parking areas would be sized to provide 1 to 2 parking spaces per unit.

The construction of the proposed lodging units and supporting utilities and infrastructure (i.e., access road and parking areas) would require demolition of the northern end of the former runway. The project area would be landscaped upon conclusion of construction activities.

2.2 No-Action Alternative

Under this alternative, no additional recreational lodging units would be constructed at Bellows AFS. There is a significant unmet demand for recreational lodging for military personnel at Bellows AFS. If the proposed project is not completed, military personnel would be denied reservations due to the limited number of cabins. Denial of accommodations could have detrimental effects on the moral and welfare of the personnel who want to use these recreational cabins at this location. In addition, Det 2, 18th Wing would not meet its mission of *enhancing combat effectiveness by delivering secure, affordable, and customer-focused recreational services*.

2.3 Decision to be Made

The decision to be made is whether up to 48 additional proposed lodging units should be constructed at Bellows AFS in order to expand the capacity of this recreational facility for military personnel.

2.4 Alternatives Considered But Not Carried Forward

2.4.1 Alternative 1

This alternative would have constructed the new recreational lodging on a parcel bounded by Pacific Lane and Tinker Road, immediately to the west of the existing 400 series cabins (Figure 2-3). This site offered very good views of the ocean and required minimal new road construction since the site was bounded on all sides by existing roads. However, due to the presence of significant historic resources at this location, the site was eliminated from further consideration.

2.4.2 Alternative 2

This alternative would have constructed the new recreational lodging on the south end of the recreation area, immediately west of the 100 series cabins and east of Tinker Road (Figure 2-3). The area is currently used for group camping and development of this site would displace group camp sites. None of the units would be beachfront or have ocean views. The area is heavily wooded with rolling terrain and would require leveling. The cost of constructing these units would be higher due to the site work required and the inability to tightly cluster the units. There is also a high probability for discovery of archaeological resources during ground disturbing activities, as cultural deposits have been previously identified in the area. Therefore, this alternative was eliminated from further consideration.

2.4.3 Alternative 3

This alternative would have constructed the new recreational lodging on the north end of the recreation area, immediately west of Tinker Road and east of the abandoned runway (Figure 2-3). It is a large open area that is relatively flat and used for group camping. None of the units would be beachfront or have ocean views. Development of this site would also displace other existing uses (i.e., group camp sites). Therefore, this alternative was eliminated from further consideration.

Map Document: (O:\GIS\Bellows_Lodging_EA\MXD\Proj_Action_rev.mxd)
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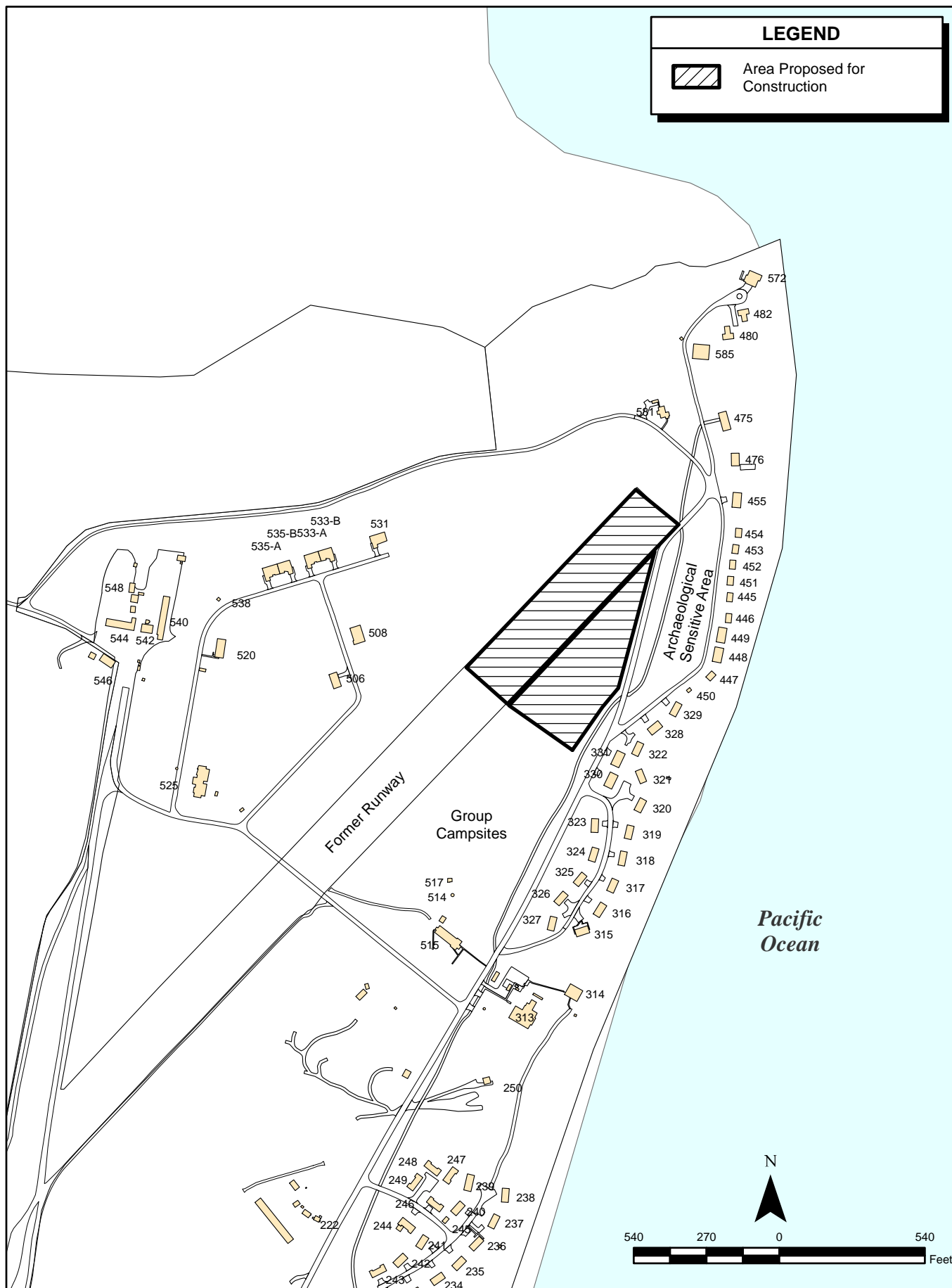
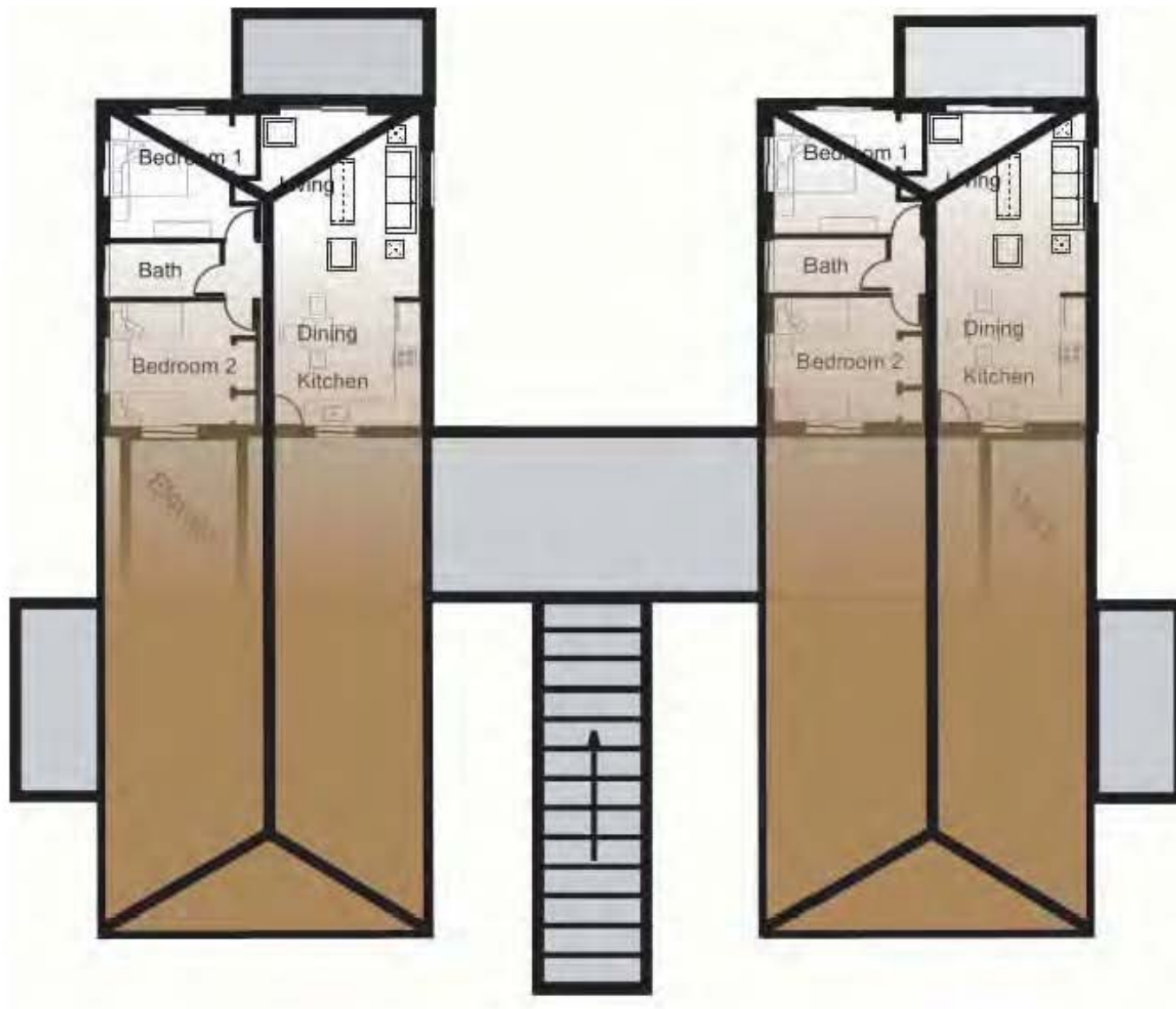


Figure 2-1
Proposed Action
Bellows Air Force Station, Oah`u, Hawaii



Not To Scale

Figure 2-2
Potential Conceptual Layout for
Recreational Lodging
Bellows Air Force Station, Oah`u, Hawaii

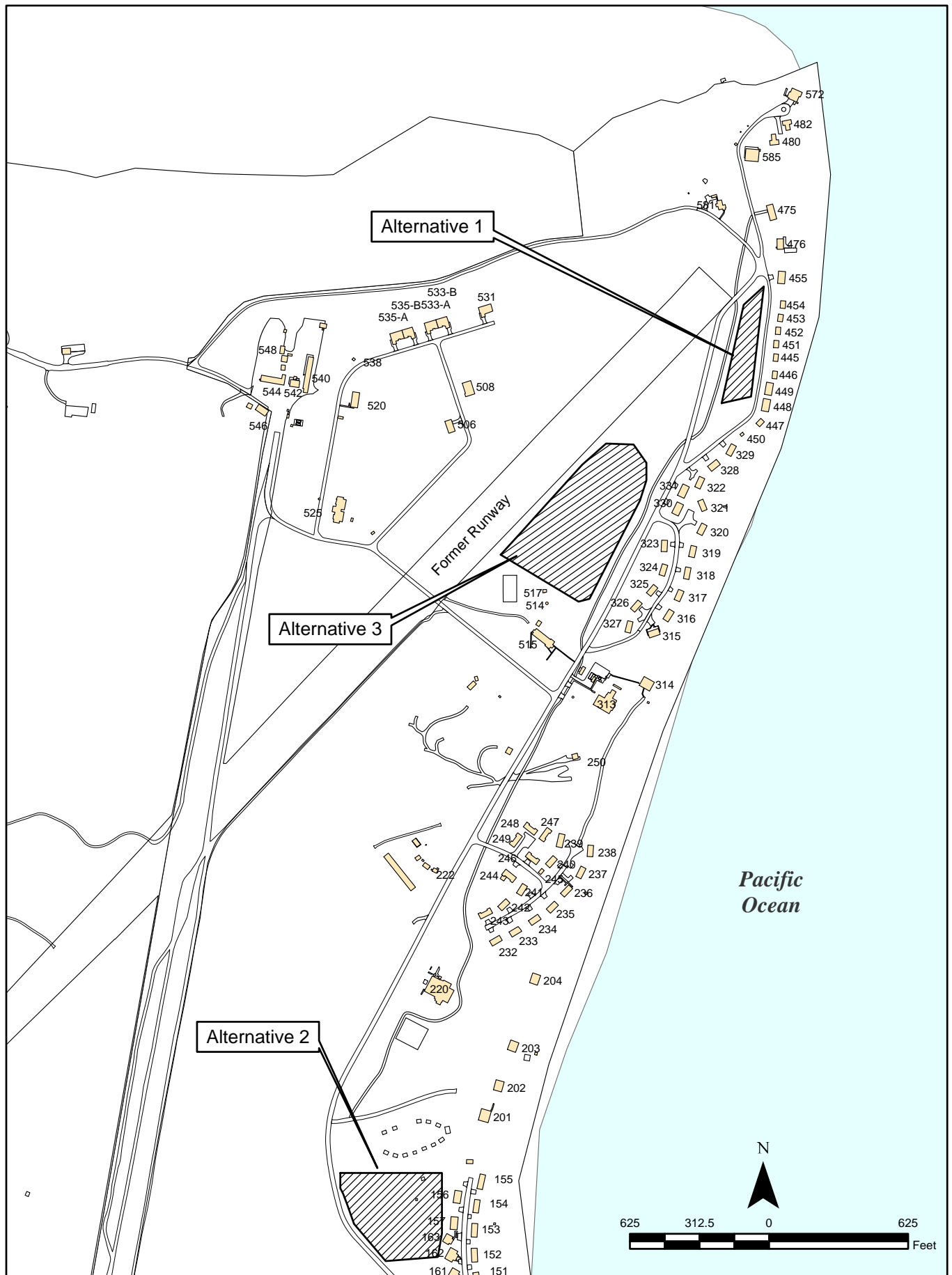


Figure 2-3
Alternative Sites Considered But Not Carried Forward
Bellows Air Force Station, Oah`u, Hawaii

IICEP Distribution List
Proposed Construction of Recreational Lodging
Bellows Air Force Station, O`ahu, Hawai`i

FEDERAL PARTIES:

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Department of Defense
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State of Hawai`i
Department of Land and Natural Resources
Land Division
1151 Punchbowl St, Room 220
Honolulu, HI 96813

State of Hawai`i
Department of Land and Natural Resources
Division of Forestry and Wildlife
1151 Punchbowl St, Room 325
Honolulu, HI 96813

Laura H. Theilen, Administrator
State Historic Preservation Division
Department of Land & Natural Resources
601 Kamokila Boulevard
Kapolei, HI 96707

Hawai`i Coastal Zone Management Program
State of Hawai`i, Office of Planning
P.O. Box 2359
Honolulu, HI 96804

Mr. Lance Foster
Office of Hawaiian Affairs (OHA)
711 Kapi`olani Blvd., Suite 500
Honolulu, HI 96813

Mr. Keith Kawaoka
State of Hawai`i
Department of Health Hazard Evaluation and
Emergency Response Office (HEER)
919 Ala Moana Blvd, Room 206
Honolulu, HI 96814

LOCAL PARTIES:

Mayor Mufi Hannemann
530 S. King St
Honolulu, HI 96813

City and County of Honolulu
Department of Planning and Permitting
650 South King Street
Honolulu, HI 96813

Chief Engineer
Board of Water Supply
630 South Beretania Street
Honolulu, HI 96813

Appendix A.2
IICEP Coordination Responses



Natural Resources Conservation Service
P. O. Box 50004
Honolulu, Hawaii 96850
(808) 541-2600

January 13, 2009

Ms. Tiffany Patrick
15 CES/CEVP
Environmental Planning Element
75 H Street
Hickam AFB, HI 96853

Thank you for providing the NRCS the opportunity to review the Proposed Action and Alternatives for Construction of New Recreational Lodging Bellows Air Force Station, Oahu, Hawaii. Please find enclosed the NRCS Soil Survey Map and soil reports. In review of the project site location it was found that no Prime or Important Farmlands exist or will be impacted at this site. In addition, no hydric soils are located in the project area. Hydric soils identify potential areas of wetlands. If wetlands do exist, any proposed impacts to these wetlands would need to demonstrate compliance with the "Clean Water Act", and may need an Army Corp of Engineers 404 permit

The enclosed Soil Survey Map identifies soil map units in the project area. The soil reports provide selected soil properties and interpretations, e.g. Dwellings W/O Basements, Local Roads and Streets, Soil Layers with USDA Textures, and Engineering Classifications. The limitation ratings for the selected uses Dwellings W/O Basements and Local Roads and Streets are moderate and somewhat limited respectively. These ratings do not preclude the intended land use, however they do identify potential limitations for the use, which may require corrective measures, increase costs, and/or require continued maintenance.

The NRCS Soil Survey is a general planning tool and does not eliminate the need for an onsite investigation. If you have any questions concerning the soils or interpretations for this project please call, Tony Rolfes, Assistant State Soil Scientist, (808) 541-2600 Ext.129, or email, Tony.Rolfes@hi.usda.gov.

A handwritten signature in blue ink, appearing to read "Lawrence T. Yamamoto", is written over a horizontal line.

Lawrence T. Yamamoto
Director
Pacific Islands Area

Cc Michael Robotham

Enclosures:





Soils Map for New Recreational Lodging Bellows Air Force Base Station, Oahu Hawaii



0 125 250 500 750 1,000 Feet

Legend

-  Approx. Project Boundary
-  Soil Survey Map Units



NRCS 1/2009

Map Unit Legend

Island of Oahu, Hawaii

Map symbol	Map unit name
JaC	Jaucas sand, 0 to 15 percent slopes

Selected Soil Interpretations

Island of Oahu, Hawaii

[The information in this table indicates the dominant soil condition but does not eliminate the need for onsite investigation. The table shows only the top five limitations for any given soil. The soil may have additional limitations]

*This soil interpretation was designed as a "limitation" as opposed to a "suitability". The numbers in the value columns range from 0.01 to 1.00. The larger the value, the greater the potential limitation.

Map symbol and soil name	Pct. of map unit	ENG - Dwellings W/O Basements (H1) *		ENG - Lawn, Landscape, Golf Fairway *		ENG - Local Roads and Streets *	
		Rating class and limiting features	Value	Rating class and limiting features	Value	Rating class and limiting features	Value
JaC:							
Jaucas	100	Moderate		Very limited		Somewhat limited	
		Rare flash flooding	0.50	Carbonate content	1.00	Flooding	0.40
		Slopes 8 to 15%	0.01	Droughty	0.96	Slope	0.01
				Too sandy	0.50		
				Slope	0.01		

Selected Soil Interpretations

Island of Oahu, Hawaii

[The information in this table indicates the dominant soil condition but does not eliminate the need for onsite investigation. The table shows only the top five limitations for any given soil. The soil may have additional limitations]

*This soil interpretation was designed as a "limitation" as opposed to a "suitability". The numbers in the value columns range from 0.01 to 1.00. The larger the value, the greater the potential limitation.

Map symbol and soil name	Pct. of map unit	ENG - Dwellings W/O Basements (HI) *		ENG - Local Roads and Streets *		ENG - Small Commercial Buildings (HI) *	
		Rating class and limiting features	Value	Rating class and limiting features	Value	Rating class and limiting features	Value
JaC:							
Jaucas	100	Moderate		Somewhat limited		Moderate	
		Rare flash flooding	0.50	Flooding	0.40	Slopes > 8%	0.98
		Slopes 8 to 15%	0.01	Slope	0.01	Rare flash flooding	0.50

Selected Soil Interpretations

Island of Oahu, Hawaii

[The information in this table indicates the dominant soil condition but does not eliminate the need for onsite investigation. The table shows only the top five limitations for any given soil. The soil may have additional limitations]

*This soil interpretation was designed as a "limitation" as opposed to a "suitability". The numbers in the value columns range from 0.01 to 1.00. The larger the value, the greater the potential limitation.

Map symbol and soil name	Pct. of map unit	ENG - Shallow Excavations (HI) *		ENG - Small Commercial Buildings (HI) *		URB/REC - Lawn, Landscape, Golf Fairway (HI) *	
		Rating class and limiting features	Value	Rating class and limiting features	Value	Rating class and limiting features	Value
JaC:							
Jaucas	100	Severe		Moderate		Severe	
		Caving potential	1.00	Slopes > 8%	0.98	Calcium carbonate > 40%	1.00
		Slopes 8 to 15%	0.01	Rare flash flooding	0.50	AWC 2-4" to 40"	0.96
						Loamy coarse sand surface	0.50
						Slopes 8 to 15%	0.01

Water Features

Island of Oahu, Hawaii

Map symbol and soil name	Hydrologic group	Surface runoff	Month	Water table		Ponding			Flooding	
				Upper limit	Lower limit	Surface depth	Duration	Frequency	Duration	Frequency
				<i>Ft</i>	<i>Ft</i>	<i>Ft</i>				
JaC: Jaucas	A	Low	January	---	---	---	---	None	Very brief	Rare
			February	---	---	---	---	None	Very brief	Rare
			March	---	---	---	---	None	Very brief	Rare
			April	---	---	---	---	None	Very brief	Rare
			May	---	---	---	---	None	Very brief	Rare
			June	---	---	---	---	None	Very brief	Rare
			July	---	---	---	---	None	Very brief	Rare
			August	---	---	---	---	None	Very brief	Rare
			September	---	---	---	---	None	Very brief	Rare
			October	---	---	---	---	None	Very brief	Rare
			November	---	---	---	---	None	Very brief	Rare
			December	---	---	---	---	None	Very brief	Rare

-----Original Message-----

From: Taketa Carolyn CIV HQ HIANG/CC
[mailto:carolyn.taketa@hihick.ang.af.mil]
Sent: Wednesday, January 14, 2009 2:01 PM
To: Patrick, Tiffany L CTR USAF PACAF CEVP/CEVP
Cc: Osserman Stanley; Espinda Jared Civ HQ HIANG/DP
Subject: Comments

RE: Construction of New Recreational Lodging, Bellows AFS, Oahu, HI'

This project is of little impact to the Hawaii National Guard as far as we can tell other than potentially increasing traffic by 5-10%.
Recommend support.

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HI 96843



January 22, 2009

MUFI HANNEMANN, Mayor

RANDALL Y. S. CHUNG, Chairman
SAMUEL T. HATA
ALLY J. PARK
ROBERT K. CUNDIFF
MARC C. TILKER

BRENNON T. MORIOKA, Ex-Officio

WAYNE M. HASHIRO, P.E.
Manager and Chief Engineer

DEAN A. NAKANO
Deputy Manager and Chief Engineer

Ms. Tiffany Patrick
15 CES/CEV, Environmental Planning Element
75 H Street
Hickam AFB, HI 96853-5233

Dear Ms. Patrick:

Subject: Your Letter Dated December 29, 2008 Requesting Input Into the Preparation of
an Environmental Assessment for Construction of New Recreational Lodging at
Bellows Air Force Station, TMK: 4-1-015:001

Thank you for the opportunity to comment on the proposed recreational lodging units.

The existing water system is presently adequate to accommodate the proposed development. However, please be advised that this information is based upon current data and, therefore, the Board of Water Supply reserves the right to change any position or information stated herein up until the final approval of your building permit application. The final decision on the availability of water will be confirmed when the building permit application is submitted for approval.

When water is made available, the applicant will be required to pay our Water System Facilities Charges for resource development, transmission and daily storage.

The on-site fire protection requirements should be coordinated with the Fire Prevention Bureau of the Honolulu Fire Department.

The proposed development is subject to Board of Water Supply cross-connection control and backflow prevention requirements prior to issuance of the building permits.

If you have any questions, please contact Robert Chun at 748-5443.

Very truly yours,

KEITH S. SHIDA
Program Administrator
Customer Care Division

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
PHONE: (808) 768-8000 • FAX: (808) 768-6041
DEPT. WEB SITE: www.honolulu.gov • CITY WEB SITE: www.honolulu.gov

MUFI HANNEMANN
MAYOR



DAVID K. TANOUÉ
ACTING DIRECTOR

ROBERT M. SUMITOMO
DEPUTY DIRECTOR

2008/ELOG-3098 (DS)

February 2, 2009

Ms. Tiffany Patrick
15 CES/CEVP
Department of the Air Force, 15th Airlift Wing
Environmental Planning Element
75 H Street
Hickam AFB, Hawaii 96853-5233

Dear Ms. Patrick:

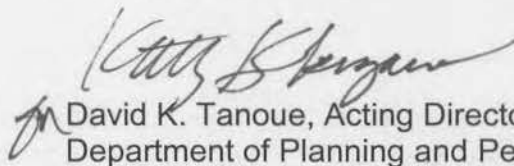
Subject: Solicitation of Input into the Preparation of an Environmental
Assessment for the Proposed Construction of New Recreational Lodging
Bellows Air Force Station, O'ahu, Hawai'i

Thank you for the opportunity to comment on the Description of Proposed Action and
Alternatives (DOPAA) for the subject project.

The Ko'olau Poko Sustainable Communities Plan (SCP) outlines general policies for
military uses in this region. As stated in Section 3.9.3 Planning Principles, it is
encouraged that energy efficient features, such as the use of solar panels, and passive
solar design be implemented in the construction of the new recreational lodges.

If you have any questions, please contact Dennis Silva, Jr., AICP of our staff at
768-8284.

Very truly yours,


David K. Tanoue, Acting Director
Department of Planning and Permitting

DKT:lh
Doc: 674597

Appendix B

Agency Correspondence



15TH AIRLIFT WING NATIONAL HISTORIC PRESERVATION ACT
COMPLIANCE REQUEST FOR SECTION 106 REVIEW AND CONCURRENCE



TO: THE HAWAII STATE HISTORIC PRESERVATION OFFICER, MS. LAURA H. THEILEN

SECTION I (Information from Proponent of Undertaking)

- A. TITLE OF UNDERTAKING:** Construction of New Recreational Lodging at Bellows Air Force Station (BAFS), O'ahu, Hawai'i
- B. PROPOSED START DATE:** FY10
- C. LOCATION:** Bellows Air Force Station, O'ahu (Atch 1)
TMK: 4-1-015:001
- D. DESCRIPTION OF PROPOSED UNDERTAKING:**

The proposed action is to construct up to 48 additional recreational lodging units at Bellows Air Force Station. The units would be constructed west of Tinker Road and the existing 400-series cabins (Atch 2). Proposed lodging units would be constructed in multi-unit one- to two-story buildings with individual units ranging from approximately 600 to 750 square feet each (Atch 2).

Sewer service for the new lodging units would be provided through the use of a septic system with a leach field. The leach field would be constructed on approximately 1.5 acres within the grassed area between the former runway and Tinker Road. Water and electrical service for the new lodging units is available along Pacific Lane and would be extended to the new lodging units underground. A new access road providing access via Tinker Road would be constructed in addition to parking areas.

The total area of disturbance would be approximately 8 acres. The construction of the proposed lodging units and supporting utilities and infrastructure (i.e., access road and parking areas) would require demolition of the northern end of the former runway within the project limits. The project area would be landscaped upon conclusion of construction activities.

Name: Jeffrey Pantaleo

Phone: (808) 449-3199

Date: 20 January 2009

SECTION II

A. IDENTIFY HISTORIC RESOURCES

1. THE ARCHITECTURAL FEATURES ARE:

A portion of World War II runway 3L-21R is located in the project area. This runway was completed in 1943 and is eligible for listing on the National Register of Historic Places (NRHP) under criterion A because it was built in response to the December 7, 1941 Japanese attack. However, due to a lack of integrity there are no plans to nominate the runway to the NRHP.

2. THE ARCHAEOLOGICAL FEATURES ARE:

Site 50-80-15-4856, a buried traditional Hawaiian cultural deposit containing evidence of habitation activities, was identified during the pre-construction archaeological survey for the proposed new recreational lodging project. A total of 15 fire-pits, which yielded small quantities of midden that are likely the remains of cooking, and two cultural layers were identified. Results of radiocarbon dating indicated occupation of Site 4856 between the mid-fifteenth and mid-seventeenth centuries.

3. **HUMAN REMAINS:**

This project is located in a high probability area for encountering human remains. If human remains are inadvertently discovered then work in the vicinity of the discovery will stop and the Air Force will take measures to help secure the remains and any associated context. If the remains are likely to be of native Hawaiian origin, Nation of Hawaii, Aloha First, Pu'uohonua O Waimanalo Village, Office of Hawaiian Affairs, O'ahu Island Burial Council, and Hui Mālama I Na Kūpuna 'O Hawai'i Nei will be notified and requested to consult in accordance with the Native American Graves Protection and Repatriation Act.

B. DETERMINE POTENTIAL EFFECT

___ Pursuant to §800.4 (d) (1), we have determined that there are no historic properties present.

___ Pursuant to §800.4 (d) (1), we have determined that no historic properties will be affected by this undertaking, as documented in this transmittal.

___ Pursuant to §800.5 (b), we have determined that this undertaking will have "no adverse effect" on historic properties.

☒ Pursuant to §800.5 (d) (2), we have determined that this undertaking will have an **adverse effect** on historic properties due alteration of the properties §800.5 (2) (ii) and lease of property out of Federal ownership §800.5 (2) (vii). We intend to consult further to resolve the adverse effect pursuant to §800.6. The following mitigative actions are anticipated:

Pursuant to §800.5 (d) (2), we have determined that this undertaking will have an **adverse effect** on historic properties due alteration of the properties. The following mitigative actions are anticipated:

We propose to mitigate any potential adverse effects through a program of data recovery and archaeological monitoring. An archaeological data recovery will be drafted for review.

SECTION III (Base Civil Engineering, Environmental Flight Signature)

Questions should be directed to the element chief of the 15 CES Environmental Planning Office:
Mr. Gary M. O'Donnell, AIA, telephone: 449-3196, e-mail Gary.Odonnell@hickam.af.mil

By: Ronnie D. Lanier
Ronnie Lanier
Chief, Environmental Flight
15th Civil Engineer Squadron

Date: 21 Jan 2009

Attachments:

- 1 Location Map Showing APE
- 2 Project Specifications

cc:

Historic Hawai'i Foundation
Office of Hawaiian Affairs
Hui Mālama I Na Kūpuna 'O Hawai'i Nei



STATE OF HAWAII
OFFICE OF HAWAIIAN AFFAIRS
711 KAPI'OLANI BOULEVARD, SUITE 500
HONOLULU, HAWAII 96813

HRD09/4128B

February 25, 2009

Ronnie D. Lanier
Chief, Environmental Flight
15 CES/CEV
75 H Street
Hickam AFB, Hawai'i 96853-5233

Re: National Historic Preservation Act Section 106 Consultation
Recreational Lodging at Bellows Air Force Station
Tax Map Key: 4-1-015:001

Aloha e Ronnie Lanier,

The Office of Hawaiian Affairs is in receipt of your January 20, 2009 letter initiating consultation pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended for the proposed construction of up to 48 additional recreational lodging units and associated utilities at Bellows Air Force Station.

The area of potential effect (APE) for this proposed undertaking encompasses approximately 8 acres and is detailed on "attachment 2" included with your letter. Based on the information within your letter, it is our understanding that historic properties have been identified within the APE and include a portion of a World War II runway and Site 50-80-15-4856, a subsurface traditional Hawaiian cultural deposit. The APE for this proposed undertaking is situated within an area with a high probability for encountering human remains.

It is our understanding that the APE has been subject to archaeological inventory survey work which identified site 50-80-15-4856. OHA requests the opportunity to review the completed report detailing this archaeological work.

The Department of the Air Force has determined that this proposed undertaking will have an adverse effect on historic properties and intends to continue consultation to resolve these adverse effects. OHA concurs with this determination and looks forward to

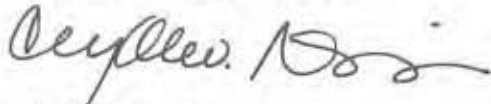
working with you and all interested parties in providing appropriate and respectful mitigation measures.

Your letter indicates an intention to draft an archaeological data recovery plan which we anticipate will be provided to all consulting parties for review and comment. Once it is finalized, OHA sees any archaeological data recovery work as continuing a good faith effort to identify historic properties within the APE pursuant to 36 CFR part 800.4(b)(1). Following completion of archaeological fieldwork, OHA looks forward to the opportunity to review the findings and anticipates the Department of the Air Force continuing consultation on resolving adverse effects to identified historic properties pursuant to 36 CFR 800.6(a).

OHA advocates for all reasonable design and engineering concepts and construction methods be explored and considered to allow for the preservation of historic properties and iwi kūpuna should this proposed undertaking move forward. OHA seeks assurances that other Native Hawaiian Organizations with connections to the APE are being consulted regarding this proposed undertaking.

Should you have any questions, please contact Keola Lindsey, Lead Advocate-Culture at (808) 594-1904 or keolal@oha.org.

‘O wau iho nō me ka ‘oia ‘i‘o,



Clyde W. Nāmu‘o
Administrator

C: Laura H. Thielen, Hawai‘i State Historic Preservation Officer
Kakuhihewa Building
601 Kamokila Boulevard, Suite 555
Kapolei, Hawai‘i 96707



DEPARTMENT OF THE AIR FORCE

15TH AIRLIFT WING

HICKAM AFB, HI

MEMORANDUM FOR US FISH AND WILDLIFE SERVICE

ATTN: Mr. Patrick Leonard

JUN 12 2009

FROM: 15CES/CEV

75H Street

Hickam AFB, HI 96853-5321

SUBJECT: Informal Section 7 consultation, construction of recreational cabins at Bellows Air Force Station

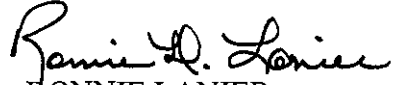
1. In accordance with the Endangered Species Act, we request an informal Section 7 consultation concerning a proposed project to build up to 48 recreational cabins at Bellows Air Force Station (AFS). This request pertains to a project currently being analyzed under NEPA, for which you received a copy of the draft Environmental Assessment dated March 2009.

2. Bellows AFS currently serves primarily as a recreational installation for active duty military and their families. The proposed cabins would enhance the capacity of the installation to serve in this function. Please see the attached Fact Sheet for additional project information.

3. The site is in a highly maintained land management unit, currently occupied by an old airfield and a maintained grassy field. Thorough biological investigations have been conducted at the proposed construction site. No RTE species have been identified at the site, although Hawaiian Hoary bats may potentially use the area. Endangered waterbirds (Hawaiian Stilts, Hawaiian Coots, and Common Moorhens, and Hawaiian Ducks) have been observed within the boundaries of Bellows AFS, primarily along shore and wetland areas of Waimanalo Stream. The proposed construction site is approximately ½ mile from the stream, and no direct or indirect effects of the action will adversely affect this habitat, as the wetland area is off limits from visitors without permission from the Base Commander due to its proximity to the Hawaiian burial vault. The Newell's Shearwater may potentially occur at or near Bellows AFS. To minimize impact, all lighting for the new cabins is slated to be either cutoff or shielded in order to limit light pollution. Threatened green sea turtles frequent the waters off of Bellows AFS. The proposed project site is set back 400 feet from the shoreline, and the sewage/wastewater from the cabins will be directed to a septic system and not discharged into the ocean.

FOR OFFICIAL USE ONLY

4. Due to the absence of effects on RTE species from this proposed project, we request your written concurrence to our determination that the project will have "no effect" on any species protected under the Endangered Species Act. Please contact our Natural Resources specialist, Dr. Aaron Hebshi, at 449-3198 if you have any questions.


RONNIE LANIER
Chief, Environmental Flight
15th Civil Engineer Squadron

Attachment1:
Project Fact Sheet



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122, Box 50088
Honolulu, Hawaii 96850



In Reply Refer To:
2009-1-0312

JUL 22 2009

Mr. Ronnie Lanier
Chief, Environmental Flight
15th Civil Engineer Squadron
75 H Street
Hickam Air Force Base, Hawaii 96853-5321

Subject: Informal Consultation on the Construction of Recreational Cabins at Bellows Air Force Station, Oahu

Dear Mr. Lanier:

This letter is in response to your June 12, 2009, request for informal consultation for the proposed construction of additional cabins for increased recreational opportunities at Bellows Air Force Station (proposed project). We received your letter on June 15, 2009. On July 8, 2009, Aaron Nadig, Fish and Wildlife biologist, requested additional information regarding the proposed project. We received all the information necessary to complete the informal consultation from Aaron Hebshi of your staff and we appreciate granting us an extension to review the proposed project. We mutually agreed that consultation would be completed by July 23, 2009. At issue are the potential effects of the proposed project on four endangered Hawaiian waterbirds; Hawaiian moorhen (*Gallinula chloropus sandvicensis*), Hawaiian coot (*Fulica alai*), Hawaiian stilt (*Himantopus mexicanus knudseni*), Hawaiian duck (*Anas wyvilliana*), and endangered Hawaiian hoary bat (*Lasiurus cinereus semotus*), threatened Newell's shearwater (*Puffinus auricularis newelli*); the endangered Hawksbill sea turtle (*Eretmochelys imbricata*), and threatened green sea turtle (*Chelonia mydas*), collectively referred to as sea turtles.

The findings and recommendations in this consultation are based on additional information provided in the July 8, 2009, phone conversation; your project description; the location of the activity; and other information available to us. A complete administrative record is on file in our office. This response is in accordance with section 7 of the Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*).

Project Description

The proposed project consists of construction of an additional 48 cabins on eight acres within the footprint of the former runway at Bellows Air Force Station. Based on the distance from the



project site (0.5 miles) to the Oxbow wetland and Waimanalo stream, the proposed action will not affect listed Hawaiian waterbirds. In addition, because construction will take place on the former runway and no vegetation will be removed, the action will not affect the Hawaiian hoary bat.

Newell's Shearwater:

The Newell's shearwater fly at night and are attracted to artificially-lighted areas which can result in disorientation and subsequent fallout due to exhaustion or collision with objects such as utility lines, guy wires, and towers that protrude above the vegetation layer. Any increase in the use of night-time lighting, particularly during each year's peak fallout period, could result in seabird disorientation, fallout, and injury or mortality. Potential impacts to seabirds could be minimized by shielding outdoor lights associated with the project, minimizing night-time construction, and providing all project staff and residents with information about seabird fallout. All lights, including street lights, should be shielded so the bulb can only be seen from below and use the lowest wattage bulbs possible. It is our understanding these minimization measures will be in place to preclude attraction of this species to Bellows Air Force Station.

Sea turtles:

Sea turtles are also susceptible to artificial lighting which can disorientate turtles away from the ocean. Turtle nests and hatchlings are susceptible to predation by feral mammals [small Indian mongoose (*Herpestes auropunctatus*), cats (*Felis catus*), dogs (*Canis familiaris*), and pigs (*Sus scrofa*)], and human disturbance. Minimization measures occurring at Bellows Air Force Station include (1) prohibition on dogs; (2) Wildlife Services trap and control feral animals at Bellows Air force Station; (3) and there is existing signage at beach locations that informs recreational users to minimize interactions with sea turtles and includes contact information to report any incidents.

Summary

Based on the above information and minimization measures, we concur with your determination that the proposed project may affect, but is not likely to adversely affect the Newell's shearwater and listed sea turtles. Unless the project description changes, or new information reveals that the effects of the proposed action may affect listed species in a manner or to an extent not considered, or a new species or critical habitat is designated that may be affected by the proposed action, no further action pursuant to the Act is necessary. If you have questions regarding this consultation, please contact Aaron Nadig, Fish and Wildlife Biologist, at 808-792-9400.

Sincerely,

for Christo Russell
Gina Shultz -
Acting Field Supervisor



DEPARTMENT OF THE AIR FORCE

15TH AIRLIFT WING

HICKAM AFB, HI

MAY 05 2008

MEMORANDUM FOR DISTRIBUTION

FROM: 15 CES/CEV

75 H Street

Hickam AFB HI 96853-5233

SUBJECT: Coastal Zone Management Federal Consistency Review for the Proposed Construction of New Recreational Lodging at Bellows Air Force Station, O'ahu, Hawaii

1. The 15th Airlift Wing (15 AW) is proposing to construct up to 48 new recreational lodging units at Bellows Air Force Station (AFS), O'ahu, Hawaii. Bellows AFS is currently maintained as a recreational area for active duty and retired military, and other authorized Department of Defense personnel.
2. A Draft Environmental Assessment of the Proposed Action has been prepared pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended (40 U.S.C. 4321-4374), the Council on Environmental Quality regulations implementing the procedural provisions of NEPA (40 CFR Parts 1500-1508), and Air Force policy and procedures (32 CFR Part 989).
3. In accordance with Section 307 of the Coastal Zone Management (CZM) Act (16 U.S.C. § 1456), 15 AW has determined that the proposed action has no significant effects on the coastal zone, and therefore does not require a CZM Federal Consistency Review. Our determination is based on the attached Federal Consistency Assessment Form and the attached Draft Environmental Assessment.
4. If you have any questions or require additional information, please contact Ms. Tiffany Patrick, 15 CES/CEVP, Environmental Planning Element, 75 H Street, Hickam AFB, HI 96853-5233 at (808) 449-3197, or email tiffany.patrick@hickam.af.mil.

GARY O'DONNELL

Chief, Environmental Planning Element
15th Civil Engineer Squadron

2 Attachments:

1. Federal Consistency Assessment Form
2. Draft Environmental Assessment

LINDA LINGLE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

LAURA E. THIRLEN
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

RUSSELL V. TSUJI
FIRST DEPUTY

KEN C. KAWAHARA
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAWOOLAE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

June 15, 2009

Mr. Gary O'Donnell
Chief, Environmental Planning Element
15th Civil Engineer Squadron
U. S. Air Force
75 H Street
Hickam AFB, Hawai'i 96853-5233

LOG NO: 2009.2625
DOC NO: 0906NM09
Archaeology

Dear Mr. O'Donnell:

**SUBJECT: National Historic Preservation Act (NHPA) Section 106 Review—
Final Report, (TSDye and Colleagues 2009) for the Proposed Construction of New
Recreational Lodging at Bellows Air Force Station,
Wāimanalo Ahupua'a, Ko'olaupoko District, O'ahu, Hawai'i
TMK: (1) 4-1-015: 001**

Thank you for providing us with the hard copy final report for the proposed undertaking is the construction of new recreational housing at Bellows Air Force Station.

Could we please have a CD with text searchable to include in the SHPD library? Thank you

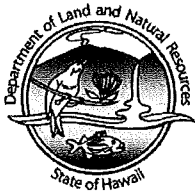
Aloha,

A handwritten signature in cursive script that reads "Nancy A. McMahon".

Nancy A. McMahon (Deputy SHPO)
Archaeology and Historic Preservation Manager

Cc: Tom Dye, TSDye and Colleagues

LINDA LINGLE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

LAURA H. THIELEN
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

RUSSELL Y. TSUJI
FIRST DEPUTY

KEN C. KAWAHARA
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING

FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

August 26, 2009

Mr. Gary O'Donnell
Chief, Environmental Planning Element
15th Civil Engineer Squadron
U. S. Air Force
75 H Street
Hickam AFB, Hawai'i 96853-5233

LOG NO: 2009.3122
DOC NO: 0908NM54
Archaeology

Dear Mr. O'Donnell:

**SUBJECT: National Historic Preservation Act (NHPA) Section 106 Review—
Concurrence with Finding--
Finding of No Significant Impact for the Proposed Construction of New
Recreational Lodging at Bellows Air Force Station,
Wāimanalo Ahupua'a, Ko'olaupoko District, O'ahu, Hawai'i
TMK: (1) 4-1-015: 001**

Thank you for providing the opportunity to comment on this draft Finding of No significant Impact which we received on May 1, 2009. The proposed undertaking is the construction of new recreational housing at Bellows Air Force Station. Based on the approved final AIS from Dye and Colleagues we **concur** with this determination by your agency.

Please contact me at (808)692-8015 if there are any questions or concerns regarding this letter.

Aloha,

A handwritten signature in cursive script that reads "Nancy A. McMahon".

Nancy A. McMahon (Deputy SHPO)
Archaeology and Historic Preservation Manager

CC: Mr. Jeffrey Pantaleo, Environmental Flight 15th Civil Engineer Squadron, U. S. Air Force, Hickam AFB, Hawai'i 96853-5221

Ms. Tiffany Patrick, 15 CES/CEVP, 75 H Street, Hickam AFB, Hawai'i 96853-5233

Tom Dye, TS Dye and Colleagues

Appendix C

Comments and Responses

**Construction of New Recreational Lodging,
Bellows AFS, Oahu, Hawaii**

Environmental Assessment

Response to Comments Received From

GENERAL PUBLIC

Project Title: Draft Environmental Assessment
Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
Reviewer: Beverly Addington, Public Comment Form
Date: 13 May 2009

Item	Comment
1	On pages 3-14 and 3-15, your report shows the ethnicity of races stated separately rather than listing them together as one race. It would show that different races would exceed the demographic/income characteristics of residents in the Kailua, Waimanalo and Waimanalo Beach so that per CEQ guidance would be greater than 50 percent of the population. This would present significant socioeconomic impact and result in high disproportionately high or adverse impacts from the proposed project per EO12898 on Environmental Justice Guidance under the National Environmental Policy Act.

Response: The Draft EA did conclude that minority populations were present in the Waimanalo and Waimanalo CDPs, per CEQ guidance. However, this does not in itself represent a significant adverse socioeconomic impact. In order for a minority or low income population to be subject to a disproportionately high and adverse effect, a significant adverse effect that can not be mitigated must be identified during the environmental review process. The Air Force has not identified any adverse effects of the proposed project that can not be mitigated to a less than significant impact, and has therefore determined that there would not be a disproportionately high or adverse effect on a minority or low income population.

2	My son is a retired Navy man. He comes out with his family (including myself) for R&R. Many people from Waimanalo come out too. It is a very nice place to go too. I think that communication is very important on both sides. This is why the Hawaiian community is so upset about the process
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Response: Thank you for your comment. The Air Force recognizes that there is considerable public interest in the proposed project and has attended neighborhood board meetings and hosted a public informational meeting to provide information to, and hear comments from, the affected community. The Air Force is committed to continuing and improving community outreach for projects being undertaken at Bellows AFS.

Project Title: Draft Environmental Assessment
 Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
 Reviewer: Lucy M. Akau, Letter
 Date: 13 May 2009

Item	Comment
1	<p>Hawaii 50th Anniversary of Statehood. Leviticus 27-24: In the Year of Jubilee the field shall return to him from who it was bought to the one who owned the land as a possession.</p> <p>Information of construction of New Recreation Lodging Bellows Air Force Station. Ezekiel 37: The Dry Bones Live. These bones are being dug up in area where it is lest expected letting others known that they are claiming these area for their generations to come. Yes the missionaries came to these islands to teach.</p> <p>Now let us enter man made laws who have decided that this is the only way to tell others of their needs. Did not remember that a Hale Koa was build in Waikiki for the use of R&R for their military families. Areas of Pearl Harbor , which includes housing, shopping centers including golf course, while checking the same thing is done at Kaneohe Marine Base, now slowing moving into Bellows. Hawaii got more military bases than any other state in America. Is this what Hawaii is being use for? In War or Peace!</p>
	<p>Response: Bellows AFS was originally established by a Presidential Executive Order (EO) in 1917. From the 1930's on, the facility was used as a site for military training and communications. In October of 1999, responsibility and control of a portion of Bellows AFS was transferred to Marine Corps Base Hawaii. Since that transfer, military training on the project site has ceased and the focus of service has become providing a place for rest and relief for all branches of the United States' global military community.</p>
2	<p>The assessment report give no information of using ceded lands as ownership or Leasing this land from ? ? ?</p> <p>EA EIS Enclosing a copy for your information.</p>
	<p>Response: The Air Force respectfully acknowledges the concerns for the ceded lands. While the Air Force recognizes the Native Hawaiians' interest in having ceded lands returned, resolution of the ceded lands issue is outside the scope of this EA.</p>

Project Title: Draft Environmental Assessment
 Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
 Reviewer: Paul Akau, Letter
 Date: 13 May 2009

Item	Comment
1	<ul style="list-style-type: none"> Do an EIS because the site does not consider the Educational Impact upon the native traditional practices of natural archaeological sites (mountains, islands, and the other natural sites).

Response: Preparation of an Environmental Impact Statement (EIS) is required when a project proponent has determined that a proposed action would result in a significant adverse impact that could not be mitigated. Adverse impacts to cultural resources identified in the Draft EA would be mitigated through a program of data recovery such that impacts would be less than significant. A letter concurring with the No Significant Impact determination was received from the State Historic Preservation Division for the proposed action. Therefore, preparation of an EIS is not warranted.

It should be noted that the Air Force is involved with public school educational programs in Waimanalo. The Hickam AFB Archaeologist facilitates field trips at Bellows AFS with the Waimanalo School District.

2	<ul style="list-style-type: none"> Will we receive the report of the answers to the questions posed tonight?
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Response: All written public comments received at the public informational meeting as well as by e-mail and mailed letters are responded to in the Final EA. All individuals providing comments on the Draft EA are included on the distribution for the Final EA.

3	<ul style="list-style-type: none"> Will the unused portions of land be returned to the people and state according to the Executive Order of the President?
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Response: A Record of Decision (ROD) signed May 7, 1996 declared approximately 170 acres of land along the southern boundary of Bellows AFS excess to military requirements. The surveyed area of 163 acres was divided into the three parcels: Parcel 1 (consisting of 3.326 acres of fee-owned land and 20.554 acres of ceded lands), Parcel 2 (85 acres of ceded lands), and Parcel 3 (54 acres of ceded lands).

Because the excess land was located adjacent to Marine training areas, land use restrictions were placed on the parcels to protect training activities. The U.S. General Services Administration (GSA) provided a quitclaim deed to the State of Hawaii for the 20.554 acres of ceded land contained in Parcel 1 in August of 1999. However, the State of Hawaii refused to accept the parcel because of the land use restrictions. Parcels 2 and 3 have the same land use restrictions as Parcel 1. Both the State of Hawaii and the Marines have expressed interest in acquiring the property. An Air Force decision regarding whether to continue with the excess process or transfer the property to the Marines has not yet been made.

It is noted, however, that the proposed project area *is not* located within the approximately 170 acres declared excess to military requirements and a decision regarding whether to construct the new recreational lodging has no bearing on the decision regarding the transfer of Parcels 2 and 3 described above.

4	<ul style="list-style-type: none"> How will tonight's meeting be recorded?
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Response: The public informational meeting was organized as a poster panel session, during which community members could have one-on-one discussions with Air Force personnel. Provisions were not made to video record or transcribe verbal testimony. However, public comment forms were provided to facilitate receipt of written comments and the public was also encouraged to mail comments prior to conclusion of the public comment period that ended on May 30, 2009.

Project Title: Draft Environmental Assessment
 Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
 Reviewer: Andrew M. Jamila Jr., Public Comment Form
 Date: 13 May 2009

Item	Comment
1	The air strip has a hard paved surface, but under the airstrip is sand that could possibly hold lwi- (cultural remains). The airstrip was built in the 30s, before EPA, before lwi registration, before statehood. The project has to be made pono.
Response: The area beneath the runway has been previously disturbed by grading and filling for construction of the runway, and the Air Force's expectation was that intact cultural deposits underneath the runway would be largely absent due to this prior disturbance. This was the underlying reason for siting the proposed project at this location. An archaeological inventory survey conducted in 2008 confirmed these expectations. Backhoe trenches excavated within the footprint of the runway exposed a single pit feature, but no cultural layers, and no human remains. The Air Force recognizes that lwi may still be inadvertently discovered during ground disturbing activities. If cultural resources including human remains are inadvertently discovered during construction, work in the vicinity of the discovery would immediately stop, the Air Force would take measures to secure the area, and site personnel would contact the State Historic Preservation Division for a determination of the origin of the remains. If the human remains are determined to be of Native Hawaiian origin, the Office of Hawaiian Affairs, Nation of Hawaii, Aloha First, Pu`uhonua O Waimanalo Village, O`ahu Island Burial Council, Hui Mālama I Na Kūpuna `O Hawai`i Nei would be notified and requested to consult in accordance with the Native American Graves Protection and Repatriation Act.	
2	The mis-information at the board meeting gave into people not being included in the process. Yes, we know the Air Force has the land for now, but we all need to be good partners, good stewards of the land. We do want to have a good working relationship with all of you.
Response: The Air Force recognizes that there is considerable public interest in the proposed project and has attended neighborhood board meetings and hosted a public informational meeting to provide information to, and hear comments from, the affected community. The Air Force is committed to continuing and improving community outreach for projects being undertaken at Bellows AFS.	
3	I know it is a done deal, to build those cabins. I know recreation is a big part of it so it must happen for our weary service people. I want to make sure that we can make it a win-win situation if the workforce and contractors and subcontractors can come from the community. I would like the military to assign me the task of getting the qualified contractors and workforce from our community, like I've done in the past for LFO 2, and other past projects.
Response: Regulations governing Federal procurement require fair competition during the procurement process. Local contractors and subcontractors are encouraged to compete for any construction contracts related to the proposed project.	

Project Title: Draft Environmental Assessment
Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
Reviewer: Kim Kalama, Public Comments
Date: 13 May 2009

Item	Comment
1	<p>While reading the Draft Environmental Assessment Construction of New Recreational Lodging Bellows Air Force Station Oahu, Hawaii March 2009, I am deeply concerned and very disturbed. We should all be alarmed.</p> <p>This DEA does not only threaten our community with added recreational buildings. This DEA is the start to a greater process which is one of permanent structures. We are now the subject to the process of elimination. We do not know the agenda of Detachment (2) 18th Air Wing, Kadena, Okinawa who now has jurisdiction over the future of Bellows. However, we do know they have a mission which states over and over in this DEA which is "to enhance combat effectiveness by delivering secure, affordable and customer-focused recreational services." It has always been my understanding that the military was put in place to protect and defend our country not to go into the business of recreation. As far as I can see Kadena's mission will never be fulfilled and there is no end to they're proposed projects. The DEA is not clear in its description and is misleading and disrespectful to the community.</p>
<p>Response: Military personnel are entitled to the same quality of life that is afforded to the society they have pledged to defend. In addition to hard work and training, maintaining a healthy, effective and combat-ready military requires opportunities for personnel to rejuvenate in a safe, affordable and accessible environment.</p> <p>As presented in Section 2.0, this Draft EA examines the proposed construction of up to 48 recreational lodging units to accommodate the high unmet demand for recreational lodging at Bellows AFS. Effort has been made to ensure that the project information presented in the Draft EA is clear, descriptive and organized.</p>	
2	<p>Don't be taken by this cabin project only. As part of they're near future plans. They plan to build a resort pool, a water park, and a 9 hole par 3 golf course amongst some of their projects. This DEA gives the green light to go to extensive future plans. Also an attachment to the DEA a FONSI which is a finding of no significant impact. According to a document in the DEA dated January 20, 2009. states "there will be an adverse effect on historic properties" or in other words a finding of significance has been reported on site. They use the words mitigation measures which helps them to justify the no significant impact.</p>
<p>Response: This Draft EA examines the potential environmental consequences associated with the proposed construction of up to 48 new recreational lodging units at Bellows AFS. No other projects are examined or approved as a result of this assessment. The Air Force has considered public comments received on the Draft EA, and in response has determined to only approve development of up to 16 new recreational lodging units in the signed Finding of No Significant Impact (rather than the originally proposed up to 48 units). Development of a pool, water park, car wash and golf course have been removed from consideration at this time. Any additional projects proposed subsequent to this Draft EA would be subject to independent review in accordance with the National Environmental Policy Act (NEPA) of 1969, the Council of Environmental Quality regulations implementing the procedural provisions of NEPA and Air Force policy and procedures.</p>	
3	<p>For those of you who do not know me. I am a resident of Waimanalo. I am also one of the many Archaeologists who have worked in Bellows. But before I became an Archaeologist. First and foremost I give my highest respect to Akua, family, Kupuna, the community I live in, culture which is Hawaiian first. I became an Archaeologist in hope that I could help make a positive difference in the education, knowledge and preservation in place theory. Being Hawaiian we have a responsibility to care for our Kupuna Iwi, our ancestral bones. As an Archaeologist it gave me first hand notice to do what I believe is proper and respectful to the best of my knowledge. What the DEA fails to address under mitigation measures is a proper place for curatorial procedures. An area to protect and store our Kupuna Iwi as well as any artifacts that may be unearthed during construction projects. A place where nothing has to leave Bellows. This location is a temporary area of protection during the process of proper treatment before our Kupuna Iwi can be returned home in the burial vault for safe keeping. These are some of my concerns. This is why it is so important for us as a community to get involved. As in a recent newspaper article it states we are stewards of the land. We are and some of us take that very seriously. We share a spiritual connection with the environment based on the principles of "stewardship" or preservation in trust for the next generation. I thank you for this opportunity to speak on my behalf. I do believe that there is a positive outcome for our community. That is why we are hear to voice and share our concerns.</p> <p>This is my written comments that I have spoke openly here tonight.</p>

Project Title: Draft Environmental Assessment
Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
Reviewer: Kim Kalama, Public Comments
Date: 13 May 2009

Item	Comment
	Response The Air Force is committed to establishing a curatorial site at Bellows AFS to protect cultural artifacts that are inadvertently discovered during any ground disturbing activities. Funding to develop such a site must be programmed and cannot be included as an enforceable mitigation measure prior to securing funding for the proposed new lodging units. However, the need for a curatorial site is recognized and funding mechanisms are presently being discussed. A temporary curatorial facility has been identified for this project. In the event that human remains are uncovered during the course of this project, they will be relocated to this site at Bellows AFS.

Project Title: Draft Environmental Assessment
 Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
 Reviewer: Kim Kalama, Letter
 Date: 12 May 2009

Item	Comment
1	<p>Thank you for the opportunity to comment on the proposed recreational lodging units and FONSI. I have a number of concerns and will try to break them down individually.</p> <p>1.) Bellows is now under the jurisdiction of Detachment (2) 18th Air Wing, Kadena, Okinawa. They have a very extensive agenda in the near future. I am concerned that they are so new to our issues here in the islands they may not be sensitive to our concerns in the community. An example is our on-going struggle with the ceded lands issue!</p>
<p>Response: The Air Force understands that there is considerable public opposition to military expansion on ceded lands. The Air Force has considered public comments received on the Draft EA, and in response has decided to only approve development of up to 16 new recreational lodging units in the signed Finding of No Significant Impact. Any future proposals to construct additional recreational lodging units would require additional NEPA analysis prior to authorization. The Air Force is committed to continuing and improving community outreach and intends to keep the Waimanalo community apprised of actions being taken at Bellows AFS.</p>	
2	<p>2.) According to the DEA there is an attachment of a FONSI, with the Finding of No Significant Impact. The DEA has a document dated January 20, 2009 that states there will be an adverse effect on historic properties.</p>
<p>Response: Appropriate and respectful mitigation measures for cultural impacts will be developed during preparation of the archaeological data recovery plan in consultation with the Hawaii State Historic Preservation Division (SHPD) and other stakeholders. SHPD concurred with the determination of No Significant Impact on cultural resources for the proposed action.</p>	
3	<p>3.) I am concerned over the increase of capacity to the community by means of commuter transportation. There are a number of additional home projects being built in our community already. Kadena does not know the status of our community or our planned projects. Our highways are running at full capacity during peak hours. The idea of a four-lane highway has been a threat to our community for some time. The additional housing units may stream line the thought of that four lane highway that I, and many community members are deeply not in favor of it to be built. This will only increase speed and a higher possibility of traffic related fatalities.</p>
<p>Response: Average annual daily traffic data obtained from the State Department of Transportation indicate that approximately 17,675 vehicles per day travel on Kalaniana'ole Highway in the vicinity of the main entrance to Bellows AFS. Construction of 48 new recreational lodging units is projected to increase traffic on Kalaniana'ole Highway by approximately 1% (refer to Section 3.12.3 of the Final EA). However, based on community concerns, the signed Finding of No Significant Impact has only authorized development of up to 16 cabins. Traffic increases resulting from construction of 16 new recreational lodging would therefore be less than 1%. This level of traffic increase is less than significant. Projected impacts on traffic have been added to Section 3.12.3 of the Final EA.</p>	
4	<p>4.) I cannot agree with something that is verbal more than visual. In this DEA there is no actual plan view of a lodging unit. You don't even know what you are going to build.</p>
<p>Response: A conceptual layout of a proposed lodging unit is presented in Figure 2-2 of the Draft EA.</p>	
5	<p>5.) I am concerned with the septic system and the leach field. 1.5 acres is a large area. It is designated to be in an area of high probability for cultural resources. I am concerned that there will be more systems built to accommodate more cabins leading to further destruction of cultural resources.</p>

Project Title: Draft Environmental Assessment
 Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
 Reviewer: Kim Kalama, Letter
 Date: 12 May 2009

Item	Comment
	<p>Response: Development of an individual wastewater system (i.e., septic tank and leach field system) for the proposed development would be coordinated with the Department of Health Wastewater Branch and would conform to the requirements of HAR 11-62, <i>Wastewater Systems</i>, such that no adverse impacts would be anticipated. This requirement has been added to Section 3.12.3 of the Final EA.</p> <p>As stated above, appropriate and respectful mitigation measures for cultural impacts will be developed during preparation of the archaeological data recovery plan in consultation with the Hawaii State Historic Preservation Division and other stakeholders. An archaeological monitor would also be present during construction activities for the duration of ground disturbing activities. If cultural resources including human remains are inadvertently discovered during construction, work in the vicinity of the discovery would immediately stop, the Air Force would take measures to secure the area, and site personnel would contact the State Historic Preservation Division for a determination of the origin of the remains. If the human remains are determined to be of native Hawaiian origin, the Office of Hawaiian Affairs, Nation of Hawaii, Aloha First, Pu`uhonua O Waimanalo Village, O`ahu Island Burial Council, Hui Mālama I Na Kūpuna `O Hawai`i Nei would be notified and requested to consult in accordance with the Native American Graves Protection and Repatriation Act. With these mitigation measures, the Air Force has determined that impacts to cultural resources would be less than significant.</p>
6	<p>6.) The project will not boost our economy. While reading through the DEA it states that they will be hiring one (1) housekeeper for every seven (7) units.</p> <p>Response: The Air Force concurs that positive socioeconomic impacts resulting from a temporary increase in construction employment and additional permanent housekeeping positions would be modest. However, impacts would be positive rather than adverse.</p>
7	<p>7.) There will be cultural resource disturbance at the north end of the project area that will have an adverse effect on site 50-80-15-4856 historic properties. Even though there will be an archaeological data recovery implemented we do not know the severity of significance until it may be too late?</p> <p>Response: An archaeological monitor would also be present during construction activities for the duration of ground disturbing activities. If cultural resources including human remains are inadvertently discovered during construction, work in the vicinity of the discovery would immediately stop, the Air Force would take measures to secure the area, and site personnel would contact the State Historic Preservation Division for a determination of the origin of the remains. If the human remains are determined to be of native Hawaiian origin, the Office of Hawaiian Affairs, Nation of Hawaii, Aloha First, Pu`uhonua O Waimanalo Village, O`ahu Island Burial Council, Hui Mālama I Na Kūpuna `O Hawai`i Nei would be notified and requested to consult in accordance with the Native American Graves Protection and Repatriation Act. With these mitigation measures, the Air Force has determined that impacts to cultural resources would be less than significant.</p>
8	<p>8.) Mitigation measures have been put in place to justify the No Significant Impact. However, they fail to have a place on-site for curatorial purposes. This site would help the impact of cultural resources and would in turn have a place to protect, store and educate. This site could be in the area of Haunaniho a location under the jurisdiction of the Air Force. This area could be used as a curatorial site as well as a museum and educational facility for both military and community alike.</p> <p>Response: The Air Force is committed to establishing a curatorial site at Bellows AFS to protect cultural artifacts that are inadvertently discovered during ground disturbing activities. Funding to develop such a site must be programmed and cannot be included as an enforceable mitigation prior to securing funding. However, the need for a permanent curatorial site is recognized and funding mechanisms are presently being discussed. Meanwhile, a temporary curatorial facility will be established at Bellows AFS.</p>
9	<p>8.) A big concern; There will be added disturbance by the trenching of water and electrical utilities!</p> <p>Response: All ground disturbance activity will occur completely within the approximately 8-acre project site, which includes the areas to be disturbed for trenching of water and electrical utilities.</p>
10	<p>9.) I am disturbed that in your No Action Alternative for 2.2 the only concern is military related. All other No Action Alternatives base it on the no disturbance to the community. This is very disrespectful to the community. If the tables were turned it would sound like this, what if this proposed project is completed community would experience detrimental effects on the morale and well being of one more non-community related recreational facility on lands that are very controversial?</p>

Project Title: Draft Environmental Assessment
Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
Reviewer: Kim Kalama, Letter
Date: 12 May 2009

Item	Comment
Response: Comment noted.	
11	10.) This concern is my greatest disappointment. I always believed the military was put in place to protect and defend our country. But instead of focusing on essential things more believable to the taxpayer and working to build trust in the communities, they neglect to address honest concerns and be respectable. The military was not intended to be in the business of recreation, and that should be left to Walt Disney or Six Flags or some other private business firm. What is the Air Force's main mission?
Response: The Air Force is committed to building a mutually respectful relationship with the community. Pacific Air Forces primary mission is to provide ready air and space power to promote U.S. interests in the Asia-Pacific region during peacetime, through crisis and in war. There is a critical state-wide shortage of training lands in Hawaii. Marine Corps Training Area Bellows provides important inland maneuver areas for Marine Corps amphibious exercises, and provides adequate land to meet day-to-day small unit tactical training requirements. The long-range development plan for Bellows AFS is to repair and improve Air Force recreation and support facilities. These valuable facilities serve not only Oahu military residents, but DoD identification card holders worldwide. Bellows AFS recreation facilities improvements address an important "quality of life infrastructure" requirement for military personnel and their families.	
12	Again, thank you for the opportunity to bring forth my concerns. The Air Force was implemented to defend our country in times of war and to protect our best interests. The Air Force was not intended to be in the recreational business. Bellows was taken by Presidential Executive Order due to war. The war Bellows was taken for is over and there are now more appropriate places for training. The land should be given back to the proper government, The Kingdom of Hawai'i. With sincere appreciation, Kimberly Kalama
Response: The Air Force respectfully acknowledges the Hawaiian people's concerns for the ceded lands. However, the ceded lands issue encompasses land holdings, legal proceedings and rights that are far greater than the scope of this EA. This EA is only able to discuss the potential impacts of the construction improvements proposed for this specific recreational facility.	

Project Title: Draft Environmental Assessment
 Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
 Reviewer: Ryan A. Kalama, Public Comment Form
 Date: 13 May 2009

Item	Comment
1	<p>Bellows AFB – Structure of Buildings – Not Accepted</p> <p>Once you have built any facility with sewage disposal there is no proper way to say it is safe. Sewage treatment and line to the plant is needed. I have swam out at the Bellows AFB Beach shores and witness the sewage bubbling from the bottom of the ocean at least 50 ft from the shoreline. I have had 13 years of United States Air Force from Communication to Billeting to commissary and finally Air Born Medical Team. I stayed out here and enjoyed it. But overpopulating Bellows AFB with R&R will have a environmental impact by sewage waters, traffic vehicles, crowded roads, and visitors trampling over private properties.</p>

Response: Development of an individual wastewater system (i.e., septic tank and leach field system) for the proposed development would be coordinated with the Department of Health Wastewater Branch and would conform to the requirements of HAR 11-62, *Wastewater Systems*, such that no adverse impacts would be anticipated. This requirement has been added to Section 3.12.3 of the Final EA.

Average annual daily traffic data obtained from the State Department of Transportation indicate that approximately 17,675 vehicles per day travel on Kalanianaʻole Highway in the vicinity of the main entrance to Bellows AFS. Construction of 48 new recreational lodging units is projected to increase traffic on Kalanianaʻole Highway by approximately 1% (refer to Section 3.12.3 of the Final EA). However, based on community concerns, the signed Finding of No Significant Impact has only authorized development of up to 16 cabins. Traffic increases resulting from construction of 16 new recreational lodging would therefore be less than 1%. This level of traffic increase is expected to be less than significant. Projected impacts on traffic have been added to Section 3.12.3 of the Final EA.

2	<p>You are all here on lease land not permanency. So when you leave who cleans up this land. EPA and Governmental Environmental Agencies are all manipulated for the usage of Foreign Visitors and Military. Any and all structures built is a violation to our environment. Remember you are all on lease land and you are leaving us a mess of problems when your time is up. We truly need land now for the Hawaiian Home Steads. We need morale, welfare, and recreation for all including the Waimanalo Community to be a part of. But we don't need any more structures. Once again any facility is pollution to our environment</p>
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Response: The Air Force understands that there is considerable public opposition to the proposed project due to concern over cultural and environmental impacts on the surrounding communities and concerns regarding military expansion on ceded lands. The Draft EA did not identify any significant adverse environmental impacts. Appropriate and respectful mitigation measures for cultural impacts will be developed during preparation of the archaeological data recovery plan in consultation with the Hawaii State Historic Preservation Division and other stakeholders.

However, the Air Force has considered public comments received on the Draft EA, and in response has determined to only approve development of up to 16 new recreational lodging units in the signed Finding of No Significant Impact. Any future proposals to construct additional recreational lodging units would require additional NEPA analysis prior to authorization.

While the Air Force recognizes some Native Hawaiians' interest in having ceded lands returned, resolution of the ceded lands issue is outside the scope of this EA.

Project Title: Draft Environmental Assessment
Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
Reviewer: Laniwai Ka'op'uiki, Public Comment Form
Date: 13 May 2009

Item	Comment
1	Recorded community townhall meeting about the building of recreational lodges. Cultural impact -

Response: Thank you for your attendance at the public informational meeting hosted by the Air Force on May 13, 2009 at the Army National Guard Training Center in Waimanalo. Cultural impacts are addressed in Section 3.3 of the Final EA.

Project Title: Draft Environmental Assessment
 Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
 Reviewer: Marvelle Ku'ulei Laughlin, Public Comment Form
 Date: 13 May 2009

Item	Comment
1	<p>According to the DEA there is an attachment of a FONSI, with the finding of No Significant Impact. The DEA document dated January 20, 2009 that states there <u>will be an adverse</u> effect on historic properties. Which is it?</p> <p>I cannot agree with something that is verbal more than visual. In this DEA there is no actual plan view of a lodging unit. There will be cultural resource disturbance at the north end of the project area that will have an adverse effect on site 50-80-15-4856 historic properties.</p> <p>Response: Adverse impacts to Site 50-80-15-4856 would be mitigated through a program of data recovery. Data recovery excavations would be designed to expose relatively wide areas of the traditional Hawaiian land surface in an effort to record the spatial pattern and ages of features along with the distribution of cultural materials within, around, and between them. All data recovery activities would be completed prior to the commencement of construction. An archaeological monitor would also be present during construction activities for the duration of ground disturbing activities. If cultural resources including human remains are inadvertently discovered during construction, work in the vicinity of the discovery would immediately stop. The Air Force would take measures to secure the area, and site personnel would contact the State Historic Preservation Division (SHPD) for a determination of the origin of the remains. If the human remains are determined to be of native Hawaiian origin, the Office of Hawaiian Affairs, Nation of Hawaii, Aloha First, Pu'uhonua O Waimanalo Village, O'ahu Island Burial Council, Hui Mālama I Na Kūpuna 'O Hawai'i Nei would be notified and requested to consult in accordance with the Native American Graves Protection and Repatriation Act. With these mitigation measures, the Air Force has determined, and the SHPD has concurred, that impacts to cultural resources would be less than significant.</p>
2	<p>This project will not boost our economy. While reading through the DEA it states that they will be hiring (1) housekeep for every (7) units.</p> <p>Response: The Air Force concurs that positive socioeconomic impacts resulting from a temporary increase in construction employment and additional permanent housekeeping positions would be modest. However, impacts would be positive rather than adverse.</p>
3	<p>Mitigation measures have been put in place to justify the No Significant Impact. They fail to have a place on-site for curatorial purposes. This site would help the impact of cultural resources and would in turn have a place to protect, store and educate resources and would in turn have a place to protect, store and educate.</p> <p>Response: A temporary curatorial facility at Bellows AFS has been identified to protect and preserve any cultural artifacts inadvertently discovered during ground disturbing activities for this project, or other projects at Bellows AFS. Funding to develop such a site must be programmed and cannot be included as an enforceable mitigation measure prior to securing funding. However, the need for a curatorial site is recognized and funding mechanisms are presently being discussed.</p>
4	<p>The Air Force was not intended to be in the recreational business. Bellows was taken by Presidential Executive Order due to war. The war Bellows was taken for is over and there are now more appropriate places for training.</p> <p>Response: Pacific Air Forces primary mission is to provide ready air and space power to promote U.S. interests in the Asia-Pacific region during peacetime, through crisis, and in war. There is a critical state-wide shortage of training lands in Hawaii. Marine Corps Training Area Bellows provides important inland maneuver areas for Marine Corps amphibious exercises, and provides adequate land to meet day-to-day small unit tactical training requirements. The long-range development plan for Bellows AFS is to repair and improve Air Force recreation and support facilities. Military personnel are entitled to the same quality of life that is afforded to the society they have pledged to defend. In addition to hard work and training, maintaining a healthy, effective and combat-ready military requires opportunities for personnel to rejuvenate in a safe, affordable and accessible environment. These valuable facilities serve not only Oahu military residents, but DoD identification card holders worldwide. Bellows AFS recreation facilities address an important "quality of life infrastructure" requirement for military personnel and their families.</p>

Project Title: Draft Environmental Assessment
Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
Reviewer: Kevin O'Grady, Esquire, E-mail
Date: 8 May 2009

Item	Comment
1	I am writing to submit comments about the proposal to build additional cabins at Bellows AFS. I completely support the proposal. I live in nearby Kailua and we frequently go to Bellows. I am a reservist. Occasionally, we try to reserve a cabin and it is difficult since there are so few. Please build them.
Response: Thank you for your comment on the Draft EA.	

Project Title: Draft Environmental Assessment
Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
Reviewer: Ikaika Anderson, Council Member, District 3, E-mail
Date: 28 May 2009

Item	Comment
1	<p>This is in response to the email I received on May 26 summarizing the draft environmental assessment for the construction of new lodging for military personnel and families at Bellows Air Force Base. I am opposed to the proposed action for construction of additional cabins and any further development at Bellows AFS or anywhere along the Waimanalo coastline. We must begin to look for alternatives to the ongoing projects which overexploit our natural resources. New development in the area means more sewer service (i.e. septic systems and leach fields) and increasing refuse and even hazardous waste. In good conscience, I also support the state Department of Hawaiian Homelands in their efforts to acquire a portion of Bellows from the United States military, and subsequently I support the No-Action Alternative.</p> <p>Thank you for taking my comments into account- I look forward to working with you and keeping the betterment of our entire community in mind.</p>

Response: Thank you for your comment. The Air Force understands that there is considerable public opposition to the proposed project due to concern over cultural and environmental impacts on the surrounding communities and concerns regarding military expansion on ceded lands. The Draft EA did not identify any significant adverse environmental impacts. Appropriate and respectful mitigation measures for cultural impacts will be developed during preparation of the archaeological data recovery plan in consultation with the Hawaii State Historic Preservation Division and other stakeholders.

However, the Air Force has considered public comments received on the Draft EA, and in response has determined to only approve development of up to 16 new recreational lodging units in the signed Finding of No Significant Impact. Any future proposals to construct additional recreational lodging units would require additional NEPA analysis prior to authorization.

Project Title: Draft Environmental Assessment
 Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
 Reviewer: Joseph N. A. Ryan, Jr., E-mail
 Date: 26 May 2009

Item	Comment
	<p>Email (Forwarded email correspondence between Joseph Ryan and Joanna Seto from the DOH):</p> <p>Mr. Ryan's Question to Ms. Seto:</p> <p>Subject: Bellows Environmental Assessment FONSI for 48 new cabins The USAF has proposed building 48 new lodging units at Bellows. In the EA, 48 units meant for occupancy by 1 family per unit is proposed. An 8 unit building (16 bedrooms/8 bathrooms) per building is portrayed in the EA. At double occupancy, it appears that 400 adults are capable of occupying the project at one time. That is also a possible total of 400 cars, just for the guests. A project of this magnitude will also require support staff; housekeepers, groundsmen, maintenance personnel, security, etc., perhaps amounting to two or three support personnel per unit. The project proposes a 1.5 acre leach field. There is no evaluation of septic systems in the EA and the impact of nitrogen and other leachates from the waste disposal system. My impression is that current science suggests that "Nitrogen losses in the septic tank ranged from 1% to 3%. Successful proprietary nitrogen removal systems [have] a net nitrogen removal capability of 60% [to] 55%, thus discharging slightly more than half the nitrogen discharged by a conventional system."</p> <p>My concern is that the impact of the nitrogen discharged by guests (even if reduced by 50% through the best available practices) into the Jaucas sand must migrate into the AA recreational waters of Waimanalo Bay. This has not been addressed in the EA. Waimanalo Bay, even to a casual observer, has long been susceptible to leachate pollution and "bubble algae", a pollutant indicator, along with a bright green algae color is usually visible in the water at Waimanalo Beach Park about a mile from the project location. People are known to complain of "Swimmers Itch" from exposure. Does the DOH have relevant information on the impact of nitrogen or other leachates from leach fields located in Jaucas sand within 750' of the shoreline?</p> <p>Ms. Seto's Response to Mr. Ryan:</p> <p>Dear Mr. Ryan,</p> <p>Thank you for your message. I apologize for the delayed response.</p> <p>The Wastewater Branch review comments were inadvertently left out of the State Department of Health's earlier comments on the Bellows Environmental Assessment. Their comments are noted below:</p> <p>The subject project is located in the Critical Wastewater Disposal Area (CWDA) as determined by the Oahu Wastewater Advisory Committee where no new cesspools will be allowed. It is also located in the Pass Zone.</p> <p>Based on the information provided, the total wastewater flow for the proposed development will exceed 15,000 gallons per day. Therefore, in accordance with our Hawaii Administrative Rules (HAR), Chapter 11-62, Section 11-62-31.1(2)(B), the installation of individual wastewater system(s) (IWS) which includes septic tank system and leach field will not be allowed for this project. We would require that a wastewater treatment plant be constructed in accordance with Hawaii Administrative Rules (HAR), Chapter 11-62, Subchapter 2 requirements for this development.</p> <p>We encourage the developer to also utilize recycled water for irrigation and other nonpotable water purposes. Also, use of recycled wastewater should be encouraged and utilized in major common areas such as parks, golf courses and other open spaces or landscaping areas.</p> <p>All wastewater plans must conform to applicable provisions of the Department of Health's Administrative Rules, Chapter 11-62, "Wastewater Systems." We do reserve the right to review the detailed wastewater plans for conformance to applicable rules. Should you have any questions, please contact the Planning & Design Section of the Wastewater Branch at 586-4294.</p> <p>The DOH does not have relevant information on the impact of nitrogen or other leachates from leach fields located in Jaucas sand within 750' of the shoreline.</p> <p>Thank you, Joanna Joanna L. Seto Engineering Section Supervisor Clean Water Branch</p>

Project Title: Draft Environmental Assessment
Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
Reviewer: Joseph N. A. Ryan, Jr., E-mail
Date: 26 May 2009

Item	Comment
	<p>Response: The e-mail received from Mr. Ryan documented e-mail correspondence between Mr. Ryan and the Department of Health (DOH) Clean Water Branch (CWB). The forwarded e-mail correspondence transmitted the DOH Wastewater Branch's comments that were inadvertently omitted from DOH's comments on the Draft EA dated May 5, 2009. Official comments from the DOH Wastewater Branch were received in a Supplemental Comment letter dated May 26, 2009. Responses to the official comments from the DOH Wastewater Branch are provided in the response to comment table for the May 26, 2009 Supplemental Comment letter.</p> <p>Furthermore, in response to public comments on the Draft EA, the Air Force has decided to only authorize construction of up to 16 recreational lodging units in the signed Finding of No Significant Impact, rather than up to 48 units as originally proposed. This would reduce the number of septic tanks required to support the proposed project. Development of an individual wastewater system (i.e., septic tank and leach field system) for the proposed development would be coordinated with the Department of Health Wastewater Branch and would conform to the requirements of HAR 11-62, Wastewater Systems, such that no adverse impacts would be anticipated. The installation of septic and leach field systems for this project would be permitted through the State Department of Health and before permitting, a State scientist would thoroughly evaluate contributory effects. This requirement has been added to Section 3.12.3 of the Final EA. It is noted that Waimanalo Bay in the vicinity of the proposed project is actually Class A, rather than Class AA.</p>

Project Title: Draft Environmental Assessment
 Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
 Reviewer: Robert Loy, Letter
 Date: 27 May 2009

Item	Comment
1	<p>I am writing to voice my strong opposition to the proposed construction of new recreational lodging at Bellows Air Force Station, Oahu Hawaii.</p> <p>I believe the Draft Environmental Impact Statement (DEIS) failed to include all potential impacts of this project, including the cultural, social and environmental impacts on surrounding communities of increasing the footprint and physical presence of the military on ceded lands. I also believe the DEIS failed to properly calculate the impacts of continued expansion of recreational resources for the exclusive use of military-related personnel on the resources and quality of life of the residents in surrounding communities.</p> <p>The No-Action alternative is the very best choice presented in the DEIS. This alternative was rejected because it impedes the ability to fulfill its mission of delivering recreational services. Those services can be provided elsewhere. To follow the logic presented in the DEIS, the Air Force could theoretically continue to expand lodging and recreational services to even greater numbers in the future, creating an exclusive military resort on ceded land that should instead be relinquished by the Air Force. The military conducts no activities at Bellows that cannot be conducted elsewhere-from military training to recreational services. There are ample resources elsewhere in Hawaii and in other locations to accomplish these goals.</p> <p>As for mitigation of the impacts of this proposal, the DEIS fails to adequately detail the impacts as well as how those impacts will be mitigated. In essence the DEIS glosses over these factors in favor of simply waiving this ill-conceived proposal to its quickest possible approval.</p> <p>This proposal is good for a few military folks but bad for our community.</p>

Response: The Air Force understands that there is considerable public opposition to the proposed project due to concern over cultural and environmental impacts on the surrounding communities and concerns regarding military expansion on ceded lands. The Draft EA did not identify any significant adverse environmental impacts. Appropriate and respectful mitigation measures for cultural impacts will be developed during preparation of the archaeological data recovery plan in consultation with the Hawaii State Historic Preservation Division and other stakeholders. While the Air Force recognizes the Native Hawaiians' interest in having ceded lands returned, resolution of the ceded lands issue is outside the scope of this EA.

There is a critical state-wide shortage of training lands in Hawaii. Marine Corps Training Area Bellows provides important inland maneuver areas for Marine Corps amphibious exercises, and provides adequate land to meet day-to-day small unit tactical training requirements. The long-range development plan for Bellows AFS is to repair and improve Air Force recreation and support facilities. Military personnel are entitled to the same quality of life that is afforded to the society they have pledged to defend. In addition to hard work and training, maintaining a healthy, effective and combat-ready military requires opportunities for personnel to rejuvenate in a safe, affordable, and accessible environment. These valuable facilities serve not only Oahu military residents, but DoD identification card holders worldwide. Bellows AFS recreation facilities improvements address an important "quality of life infrastructure" requirement for military personnel and their families. Other Department of Defense facilities offering recreational cabins include the Kaneohe Marine Corps Base (14 cabins), NAS Barbers Point (24 cabins), and the Piliiaau Army Recreation Center (42 cabins). However, occupancy rates at these facilities are also between 92 and 98% in the peak-season.

The Air Force does not concur that the proposed project would result in significant adverse cultural or environmental impacts. However, the Air Force has considered public comments received on the Draft EA, and in response has determined to only approve development of up to 16 new recreational lodging units in the signed Finding of No Significant Impact. Any future proposals to construct additional recreational lodging units would require additional NEPA analysis prior to authorization.

Project Title: Draft Environmental Assessment
 Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
 Reviewer: Wilson Kekoa Ho, Letter (on behalf of the Waimanalo Neighborhood Board)
 Date: 18 May 2009

Item	Comment
1	<p>The Waimanalo Neighborhood Board #32 takes this opportunity to thank the United States Air Force for the opportunity to comment on the Draft Environmental Assessment for the Construction of New Recreational Lodging at Bellows Air Force Station, Oahu, Hawaii.</p> <p>The Waimanalo Neighborhood Board is an elected body whose purpose is to advise government officials on community issues. Several board members attended the information meeting on May 13, 2009 and board members have reviewed the proposal. By Motion at the regular meeting of the Board held on Monday, May 18, 2009, the Waimanalo Neighborhood Board has approved the following comments:</p> <p>Comment 1 – EJ [Environmental Justice] Concerns:</p> <p>The Waimanalo Community is geographically isolated from the Enchanted Lakes, Kailua, Lanikai, Hawaii Kai and Manoa communities by mountains. This fact is not readily evident in the EA. Waimanalo, as the primary affected community, is predominantly non-Caucasian with a large primary population of people of Hawaiian descent. The inclusion of a community (Kailua) separated by a mountain from the project site skews the population data in § 3.11.2. The reliance on population data that is already a decade old is ludicrous. Because of the age of the data, the Air Force should be more reliant on persons and organizations with anecdotal or practical knowledge in the community. It is our experience and belief that there are far more than 654 “individuals below the poverty level” in the Waimanalo census tracts. The EA, by inclusion of irrelevant data, appears to have been prepared to avoid addressing environmental justice considerations.</p> <p>Response: Kailua residents provided public comments on the Draft EA and therefore it is appropriate to include Kailua as part of the affected community. The Air Force has not attempted to avoid addressing environmental justice issues. Section 3.11.2 of the EA clearly states that: “Per CEQ guidance (CEQ 1997), minority populations are present in the Waimanalo and Waimanalo Beach CDPs, as greater than 50 percent of the population are identified as American Indian or Alaskan Native; Asian; Black or African American; Native Hawaiian or Pacific Islander; or Hispanic.”</p>
2	<p>Comment 2 – The NEPA Process and Methods Employed by the Air Force Do Not Give the Community a Meaningful Opportunity to Participate in the EA Process</p> <p>The Waimanalo Neighborhood Board understands that Air Force EIAP Regulation AFI32-7061 requires:</p> <p style="padding-left: 40px;">In accordance with Title VI of the Civil Rights Act of 1964, each Federal agency shall ensure that all programs or activities receiving Federal financial assistance that affect human health or the environment do not directly, or through contractual or other arrangements, use criteria, methods, or practices that discriminate on the basis of race, color, or national origin.</p> <p>The community is admitted to be predominantly Hawaiian with strong cultural ties to the affected project site. The Hawaiian culture, until western influence, utilized an oral history for nearly two thousand years. Many very bright and articulate people of this ethnicity still rely on vocal communication as a preference over writing. Many substantive comments were made at the May 13 meeting, however, no one took notes, tape recorded, or video recorded the proceeding. As a result, those many appropriate comments may have been lost and will not be considered in the EA.</p> <p>The 15th Airlift Wing out of Hickam has recognized the fact in the past and conducted itself within seemingly appropriate cultural paradigms. The “Det 2, 18th Wing”, of Kadena Japan, has not given individuals within the community an appropriate opportunity for meaningful comment or involvement in the project.</p> <p>The Air Force NEPA process must utilize a method that gives the Hawaii community a meaningful opportunity to participate and be heard. NEPA requires a collaborative effort and not just an opportunity to vent frustrations. The NEPA process requires a method for recording oral comments when dealing with any ethnicity that exhibits a propensity for oral communications.</p>

Project Title: Draft Environmental Assessment
Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
Reviewer: Wilson Kekoa Ho, Letter (on behalf of the Waimanalo Neighborhood Board)
Date: 18 May 2009

Item	Comment
	Response: Federal Regulations do not require circulation of a draft EA for public comment, but as a practice, the AF decided to circulate this EA for public comment because of the known community interest. Actions taken by the Air Force to involve the public in the environmental review process are described in Section 1.6 of the Final EA. The public meeting held on May 13, 2009 at the Army National Guard Training Center was advertised as a public informational meeting, not a formal public hearing. Therefore, arrangements to record or transcribe verbal testimony were not made. The AF apologizes if there was any misunderstanding about the purpose of a public informational meeting, vice a formal hearing where statements are recorded.

Project Title: Draft Environmental Assessment
 Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
 Reviewer: Wilson Kekoa Ho, Letter (on behalf of the Waimanalo Neighborhood Board)
 Date: 18 May 2009

Item	Comment
3	<p>Comment 3 – Reasonable Alternatives Have Not Been Considered</p> <p>“Reasonable” alternatives are those that meet the underlying purpose and need for the proposed action and that would cause a reasonable person to inquire further before choosing a particular course of action. Reasonable alternatives are not limited to those directly within the power of the Air Force to implement. They may involve another government agency or military service to assist in the project or even to become the lead agency.</p> <p>32 CFR § 989.8. The underlying purpose of the proposed action is to “enhance[e] combat effectiveness by delivering secure, affordable, and customer-focused recreational services”. The draft FONSI misapprehends the underlying purpose as being “to construct new recreational lodging units at Bellows AFS”. The narrow definition violates Air Force Policy, to wit: “The scope and manner of presentation indicates that the project has been “so narrowly define[d] that [it] unnecessarily limit[s] consideration to the proposal initially favored by proponents.” 32 CFR 989.8.</p> <p>The alternatives addressed in the EA do not “cause a reasonable person to inquire further before choosing a particular course of action.” The EA and draft FONSI point to a foregone conclusion: lodging is needed <i>at Bellows</i>.</p> <p>Section 2.3 of the EA supports the conclusion that the EA and Draft FONSI have not considered reasonable alternatives. § 2.3 states: “The decision to be made is whether...units should be constructed at Bellows AFS...” This section requires that the alternatives that must be considered are other locations outside Bellows and location that are not necessarily under the control of any branch of the military services.</p> <p>A reasonable person must ask “Why is this project needed <i>at Bellows</i>?” There is no discussion in the EA of the appropriate recreational facilities construction that would serve the “underlying purpose” elsewhere in Hawaii or the Pacific Area of Command.</p> <p>The query also raises a number of collateral questions for which no answer is found in the EA, to wit:</p> <ol style="list-style-type: none"> (1) Why is “Det2, 18th Wing” out of Kadena, Japan the responsible unit? (2) Does the decision maker have any practical experience in Waimanalo or at Bellows? (3) Does the decision maker have a practical knowledge of the impact on highway traffic on Kalanianaʻole Hwy (the EA does not address local traffic conditions) and other local conditions such that the decision maker can recognize an adverse impact when raised or alleged? <p>All branches of the military have been outsourcing support services for years. R&R is collateral to the military (national security) mission. Can the need for recreational lodging be outsourced to private corporations operating out of the Kalaeloa or Barber’s Point or the new housing development near the Admiral’s Landing or even the old Haleiwa airfield (with great diving, clean water, fantastic shore/surf casting fishing, and a short distance from many of the major surfing venues/attractions, deep sea sport fishing, shark diving tours, etc.)? All of these locations, and many more, have sufficient existing community infrastructure, major transportation routes, and are more centrally located to most Oahu military installations.</p> <p>Again, the scope and manner of presentation indicates that the project has been “so narrowly define[d] that [it] unnecessarily limit[s] consideration to the proposal initially favored by proponents” violates Air Force Policy published at 32 CFR 989.8.</p>

Project Title: Draft Environmental Assessment
Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
Reviewer: Wilson Kekoa Ho, Letter (on behalf of the Waimanalo Neighborhood Board)
Date: 18 May 2009

Item	Comment
	<p>Response: A project validation assessment prepared in 2005 included a market area analysis of other military recreational lodging facilities on Oahu. Other facilities offering recreational cabins include the Kaneohe Marine Corps Base (14 cabins), NAS Barbers Point (24 cabins), and the Piliiaau Army Recreation Center (42 cabins). Occupancy rates at these facilities are also between 92 and 98% in the peak-season. Hale Koa Hotel offers resort style accommodations that are not comparable to the amenities offered at cabin facilities. Kaneohe Marine Corps Base, NAS Barbers Point, and the Piliiaau Army Recreation Center are under control of the Marines, Navy, and Army respectively. Development of additional cabins at these locations would not provide a means for Bellows AFS to fulfill its mission, and therefore, would not fulfill the purpose of and need for action.</p> <p>Bellows provides a regional service primarily to the Pacific area of operation. Active duty Air Force have priority for the Bellows facility over other branches of the military. Air Force members do not have priority at Navy/Marine Corps facilities such as the Pacific Missile Range Facility at Barking Sands, Kauai.</p> <p>Three alternative sites were considered within Bellows AFS, but all three were dismissed from further consideration due to the relatively greater likelihood of encountering significant historic resources at these locations compared to proposed location, and other site constraints. The three alternative sites considered at Bellows AFS, but subsequently eliminated from further consideration are summarized in Section 2.4 of the EA.</p> <p>In response to the three questions posed by the reviewer:</p> <p>1) Bellows was reassigned to the 18th Wing at Kadena AB, Japan due to joint basing transformation at Hickam AFB. Kadena has the capabilities and resources to fully support Bellows Air Force Station.</p> <p>2) Kadena has prior experience making decisions through the environmental assessment process. The Kadena staff is familiar with Waimanalo and Bellows Air Force Station. The 15th Airlift Wing Environmental Flight is also providing full support to advise Kadena. The process for developing the EA has involved a contractor team familiar with the Waimanalo area. The full environmental assessment along economic analysis and operational analysis will be provided to Kadena to ensure they are fully knowledgeable of all aspects and impacts of the project.</p> <p>3) The traffic data obtained from the State Department of Transportation provides some practical knowledge and based on that information there are no significant impacts. Traffic increases resulting from construction of 16 new recreational lodging units would be less than 1%. (See response to Waimanalo Neighborhood Board comments Item 4).</p> <p>The National Environmental Policy Act (NEPA) requires Federal decision-makers, at all levels, to consider the environmental consequences of a proposed action in the decision-making process before deciding to take an action. NEPA, however, does not mandate who the decision-maker should be, that person should have first-hand knowledge of the project area or where the decision-maker should be located.</p> <p>Finally, Recreation is part of the Air Force mission to ensure the well being of its members and outsourcing is not viable economic solution in Hawaii. Bellows needs additional lodging to stay economically viable.</p>

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 Date: 18 May 2009

Item	Comment
4	<p>Comment 4 – Kalanianaʻole Hwy. Traffic Not Discussed.</p> <p>In this EA, 48 units meant for occupancy by 1 family per unit are proposed. The design has not been finalized and could eventually consist of 48 individual units although an 8 unit building (16 bedrooms/8 bathrooms) per building is portrayed in the EA. At double occupancy, approximately 200 adults are capable of occupying the bedrooms at one time. The EA does not state any prohibition on roll-away beds and additional occupancy may increase to 300 guests.</p> <p>A project of this magnitude will also require support staff; housekeepers, groundsmen, maintenance personnel, security and commissary personnel, etc. As well as non-military related persons and vehicles, e.g., delivery persons, perhaps amounting another 50 people who necessarily must drive to work. While not a part of this EA, substantial collateral activities exists and contribute to the cumulative effect of the project: it appears the camp grounds been expanded and other recreational activities not requiring an EA (perhaps performed under a CE: categorical exemption) have increased over the last several years. The combination of projects has increased traffic such that a vehicle estimate of 500 to 1000 daily count does not seem an exaggeration. The impact on traffic is not adequately discussed:</p> <ol style="list-style-type: none"> (1) The EA, to be fair, should at least graph (chart) the number of vehicles per day (or month) that pass through the AF main gate (2nd gate) with historical data to estimate the future impact. How many vehicles/day in 1960, 1970, 1980, etc., up to and including the future impact on traffic infrastructure. (2) The additional units are also likely to change the demographics of the guests. The current long wait time has created a situation where usually only military personnel with the ability to use long-range planning are able to get reservations and occupy the existing lodging units. Greater availability will attract a much younger demographic and is likely to lead to more partying and increase drunk driving and other police related incidents off-base. The local police infrastructure will be significantly impacted by the proposed action and that predictable impact has not been mitigated to insignificance. (3) The project site requires vehicles to access from Kalanianaʻole Hwy. A project of this magnitude will create a situation the community vehemently opposes: the widening of Kalani Hwy to four lanes. The community is opposed because of community knowledge of what happened in Nanakuli, Maile, and Waianae and other areas where the highway has been widened to four lanes: pedestrians die and traffic accidents increase because of high speeds through residential communities. The most direct access from other military bases or the airport on Oahu takes the projected additional traffic right past Waimanalo Elementary and Middle School. (4) The 15th Airlift Wing, ERP performed a feasibility study for landfill site LF01, a site that contains known hazards, i.e., lead contamination. The site is only a short distance from the proposed project. The sole non-mitigatable reason for not removing the landfill was the impact on highway traffic of moving less than 9,000 cu.yd. of CERCLA material over several months. The traffic impact was thought to be a maximum of eleven vehicle trips per day over 30 days. The project is therefore inconsistent with other Air Force recommendations/determinations. <p>The failure to address these issues is further indication that the EA “is unnecessarily limit[ed to] consideration [of a] proposal initially favored b proponents.” 32 CFR 989.8. The EA and FONSI have not considered and have not mitigated to insignificance the collateral impacts of the project.</p>

Project Title: Draft Environmental Assessment
 Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
 Reviewer: Wilson Kekoa Ho, Letter (on behalf of the Waimanalo Neighborhood Board)
 Date: 18 May 2009

Item	Comment
	<p>Response: Average annual daily traffic data obtained from the State Department of Transportation indicate that approximately 17,675 vehicles per day travel on Kalanianaʻole Highway in the vicinity of the main entrance to Bellows AFS. Assuming that guests would use two vehicles per lodging unit, and that guests would make one round-trip excursion from Bellows AFS each day, the proposed development would increase traffic on Kalanianaʻole Highway by 192 vehicles. This would result in an approximately 1% increase in traffic on Kalanianaʻole Highway (refer to Section 3.12.3 of the Final EA).</p> <p>In response to public comments on the Draft EA, the Air Force has decided to only authorize construction of up to 16 recreational lodging units in the signed Finding of No Significant Impact, rather than 48 units as originally proposed. Traffic increases resulting from construction of 16 new recreational lodging units would therefore be less than 1%. Construction of 16 new recreational lodging units would add approximately two housekeeping positions at Bellows AFS, which would not impact local traffic.</p>
5	<p>Comment 5 – No Action Alternative Not Properly Addressed</p> <p>The “No Action Alternative” detrimental effects, discussed in § 2.2, can be mitigated by locating the project to a less culturally important and traffic sensitive location in the Pacific region.</p> <p>Response: Thank you for your opinion.</p>
6	<p>Comment 6 – Project Non-Sustainability Re: Waste Disposal</p> <p>According to the FONSI the 1.5-acre leach field will be located adjacent to the “archaeological sensitive area” and 500’ from the shoreline.</p> <p>There is no evaluation of septic systems and the impact of nitrogen and other leachates in the EA. Current state-of-the-art and science suggests: “Nitrogen losses in...septic tank [systems] range[s] from 1% to 3%. Successful proprietary nitrogen removal systems [have] a net nitrogen removal capability of 60% [to] 55%, thus discharging slightly more than half the nitrogen discharged by a conventional system.” The impact of the nitrogen discharged by guests (even if reduced by 50% through the best management practices (BMPs) which also are not discussed in the EA) into the Jaucas sand and which must migrate into the AA recreational waters of Waimanalo Bay has not been addressed in the EA. The leachates will be deposited into calcium carbonate sand within 500’ of the existing shoreline and within 100’ of the archaeologically sensitive site according to figure 2-1.</p> <p>Further the traditional method of dealing with various types of waste water by “injection well” has not been discussed at all. Bellows still operates at least two state permitted injection wells. The location of the injection wells is not disclosed in the EA and therefore the contributory effect the injection wells may have on the sewage leachate migration to the sea has not been addressed or mitigated to insignificance.</p> <p>Waimanalo Bay, even to a casual observer, has long been susceptible to leachate pollution and “bubble algae”, a pollutant indicator, along with a bright green algae color is often visible in the water at Waimanalo Beach Park about a mile from the project location. People are known to complain of “Swimmers Itch” from exposure. Further investigation and mitigation measures are needed to prevent the degradation of the resource.</p> <p>The long term effect of this project appears likely to destroy the very desirability of Bellows as a recreation area. The project is therefore non-sustainable. For comparison purposes, the City and County of Honolulu limits the number of persons per day that can visit Hanaumua Bay to prevent irreversible damage to the natural resource that is the attraction. The same situation occurs here. Bellows is the attraction because of its desirability; the project will impact ocean water quality and lessen the desirability of Bellows as a recreational area eventually reducing the desirability factor that drives the project.</p>

Project Title: Draft Environmental Assessment
 Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
 Reviewer: Wilson Kekoa Ho, Letter (on behalf of the Waimanalo Neighborhood Board)
 Date: 18 May 2009

Item	Comment
	<p>Response: In response to public comments on the Draft EA, the Air Force has decided to only authorize construction of up to 16 recreational lodging units in the signed Finding of No Significant Impact, rather than 48 units as originally proposed. This would reduce the number of septic tanks required to support the proposed project. Development of an individual wastewater system (i.e., septic tank and leach field system) for the proposed development would be coordinated with the Department of Health Wastewater Branch and would conform to the requirements of HAR 11-62, <i>Wastewater Systems</i>, such that no adverse impacts would be anticipated. This requirement has been added to Section 3.12.3 of the Final EA. It is noted that Waimanalo Bay in the vicinity of the proposed project is actually Class A, rather than Class AA.</p> <p>The only active injection wells at Bellows are not required to be closed by EPA because of the low level of discharge and are regulated under the State Department of Health. The installation of septic and leach field systems for this project would be permitted through the State Department of Health and before permitting, a State scientist would thoroughly evaluate contributory effects.</p>
7	<p>Comment 7 – Community Infrastructure is Not Sufficient to Support the Project</p> <p>Where are all these people going to shop? Similar to the traffic impact described above, the Waimanalo community does not have sufficient stores selling the personal items needed to support the large number of “guests”. The base appears to have a single mini-mart to accommodate base visitors and personnel. Will the large number of guests and their dependants require construction of a full-service full-scale commissary and other supporting infrastructure?</p> <p>The military mission of other branches of the service must also be affected. The presence of additional guests surely must have some adverse impact on Marine training or vice-versa.</p> <p>Response: In response to public comments on the Draft EA, the Air Force has decided to only authorize construction of up to 16 recreational lodging units in the signed Finding of No Significant Impact, rather than 48 units as originally proposed. There are no plans to construct a full-scale commissary or other infrastructure to specifically accommodate additional guests at Bellows AFS. The Marine Corps has not commented that the proposed project would adversely affect their training activities.</p>
8	<p>Comment 8 – Change in the Mission</p> <p>It is remarkably clear from the EA that Air Force mission at Bellows has changed dramatically since 1970 (shut down of the Nike site). The portion of Bellows occupied by the Air Force no longer serves the intended purposes which justified the 1917 Executive Order to wit: National Security. To the best of our knowledge, this is the first EA unrelated to base environment restoration actions. It is therefore an unusual case, a new kind of action, and a precedent-setting case that should not be approved by a FONSI. The change in mission requires adequate study of new and unanticipated environmental impacts.</p> <p>Response: The AF respectfully disagrees with the opinion that there has been a substantial change in mission, or if there was, that an EIS is automatically required.</p>

Project Title: Draft Environmental Assessment
 Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
 Reviewer: Wilson Kekoa Ho, Letter (on behalf of the Waimanalo Neighborhood Board)
 Date: 18 May 2009

Item	Comment
9	<p>Comment 9 – EA Concerns a Small Part of a Much Larger Project and NEPA Requires the Larger Project Be Assessed for Impact</p> <p>Please review NEPA Title I (42 USC § 4331). Under NEPA all aspects of an action are required to be reviewed because of the impact, in part, and not limited to, on future generations, to wit: “[I]t is the continuing responsibility of the Federal Government to use all practicable means, consistent with other essential considerations of national policy, to improve and coordinate Federal plans, functions, programs, and resources to the end that the Nation may [...] 1. fulfill the responsibilities of each generation as trustee of the environment for succeeding generations...”.</p> <p>The EA references future projects proposed at Bellows which include a “water park” and and 18 hole golf course (references as two 9 hole courses) and expanded bath houses, a car wash and swimming pool at table 4.1. NEPA requires these actions to be addressed as a whole project. It violates the intent and purpose of the law to perform an EA for 48 lodging units while expanding the bath houses under a CE and using the 48 lodging units as justification for a need for a waterpark, swimming pool and 18 hole golf course.</p> <p>Future generations and the current generation need to know that Col. Morris as “trustee” has approved a complete project and has exercised good judgment having considered all aspects of the proposal and the related projects and effects.</p> <p>It is clear that the total concept is to create an urban resort complex and it is also apparent that the intent is to avoid a full and fair NEPA assessment by performing the review activities piecemeal. This piecemeal review appears to have mislead at least one of the consulting agencies e.g., the City and County of Honolulu, DPP, which based its comment on the continued use of Bellows and this project for “[n]ational defense objectives” by the reference to the Koolau-poko Sustainable Communities Plan and not on the stated “customer-focused recreational services” defined in the FONSI.</p>
<p>Response: The future actions described in Section 4.1 of the EA, are actions that are reasonably foreseeable but not ripe for decision, and were provided for informal public scoping only. The Air Force recognizes there is public opposition to development of a pool, water park, car wash and golf course at Bellows AFS and has removed development of these facilities from consideration at this time. Additionally, the amount of cabins has been down scoped to no more than 16. Section 4.1 of the Final EA has been revised to reflect this decision.</p>	

Project Title: Draft Environmental Assessment
 Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
 Reviewer: Jody Green, E-mail
 Date: 30 May 2009

Item	Comment
1	As a life-long resident of Waimanalo, member on the Bellows Restoration Advisory Board, and founder of the Waimanalo Beachlot Assn. I would like to comment on the proposed cabins project. There is a tremendous traffic problem in Waimanalo, and if there are more cabins built, Waimanalo roads will only become more congested, thereby negatively impacting the community. There is a water shortage on Oahu, and there have been many sewage spills into our lovely bay in the past.
Response: Construction of 48 new recreational lodging units is projected to increase traffic on Kalanianaʻole Highway by approximately 1% (refer to Section 3.12.3 of the Final EA). However, the signed Finding of No Significant Impact has only authorized development of up to 16 cabins. Traffic increases resulting from construction of 16 new recreational lodging would be less than 1%. Per correspondence from the Board of Water Supply dated January 22, 2009, the existing water system is presently adequate to accommodate the proposed development (Appendix A).	
2	Waimanalo is a fragile, small town, and we receive more than our share of tourists and visitors to our beautiful beach. The problem with the proposed cabins, possible water/ golf recreation facilities and any other additions to Bellows are as follows: 1. There are already golf courses and a waterpark on the island. The water park is on the Leeward side of the island, where they can handle the extra cars and they would be more than happy to have the business in these hard economic times. There are several golf courses, and Olomana Golf Links could use the business, too. These existing recreational facilities use a huge amount of our precious water already, we don't need to be using more.
Response: The Air Force recognizes there is public opposition to development of a pool, water park, car wash, and golf course at Bellows AFS and has removed development of these facilities from consideration at this time. Section 4.1 of the Final EA has been revised to reflect this decision.	
3	2. There are many empty hotel rooms in Waikiki that offer military discounts to our servicemen; Waikiki has the nightclubs and social scenes in the vicinity--walking distance. The local economy benefits from this, and it helps keep jobs that are in jeopardy because tourism is down.
Response: Waikiki hotels offer resort style accommodations that are not comparable to the amenities offered at cabin facilities. Many military families prefer to recreate in a relaxed cabin setting that hotels and resorts cannot provide.	
4	3. The sewage project that is proposed puts Waimanalo Bay at risk in the event of heavy rains, and the ocean and surrounding reefs are already suffering because of high nitrate levels.
Response: Development of an individual wastewater system (i.e., septic tank and leach field system) for the proposed development would be coordinated with the Department of Health Wastewater Branch and would conform to the requirements of HAR 11-62, <i>Wastewater Systems</i> , such that no adverse impacts would be anticipated. This requirement has been added to Section 3.12.3 of the Final EA.	
5	4. Bellows was used as a military base and it now appears to be a recreational destination. Waimanalo has long wanted the return of this land because of the historical importance of this sacred area. There are confirmed remains located right where proposed construction is planned, and evidence of an ancient fishing village. It is now known that Bellows Beach is one of the first places our ancestors landed upon their arrival to Hawaii.
Response: Archaeological inventory survey results indicate that the northeastern end of the grassed portion of the proposed project area is within Site 50-80-15-4856 –identified as a traditional Hawaiian cultural deposit. Backhoe trenches excavated within the footprint of the runway exposed a single pit feature and a paleosol that was the land surface during traditional Hawaiian times, but no cultural layers. Appropriate and respectful mitigation measures for cultural impacts will be developed during preparation of the archaeological data recovery plan in consultation with the Hawaii State Historic Preservation Division and other stakeholders.	
While the Air Force recognizes some Native Hawaiians' interest in having ceded lands returned, resolution of the ceded lands issue is outside the scope of this EA.	

Project Title: Draft Environmental Assessment
Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
Reviewer: Jody Green, E-mail
Date: 30 May 2009

Item	Comment
6	Although a public comment was required for the Environmental Impact, there was hardly enough time to let the community at large respond, even with the extension; this is a very important issue with severe implications for this small community. Since Waimanalo would hardly be reaping any of the benefits, the only impacts would be negative, as I have stated above. The Waimanalo Beachlot Assoc. feels that your project does not include enough alternatives, and when one looks to existing recreational facilities on Oahu, we feel there is absolutely no need for any more cabins, golf courses, water parks, traffic, sewage systems, or water parks in our small town.

Response: The Air Force does not concur that the proposed project would result in significant adverse cultural or environmental impacts. However, the Air Force has considered public comments received on the Draft EA, and in response has determined to only approve development of up to 16 new recreational lodging units in the signed Finding of No Significant Impact, and to remove development of a pool, water park, and golf course from consideration at this time.

Project Title: Draft Environmental Assessment
 Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
 Reviewer: Dale Evans, E-mail
 Date: 29 May 2009

Item	Comment
1	<p>As a long-time resident of Waimanalo, I am opposed to expansion of recreational lodging facilities at Bellows AFS. We are a rural/agricultural and suburban-residential community, and my experience informs me that my fellow residents largely do not wish to see additional tourism activities occur. In fact, the consensus in the community is that we wish to have portions, or all, of Bellows AFS returned to the state for the benefit of ALL U.S. CITIZENS, not just those who have served in the armed forces.</p> <p>My specific objections to the proposed expansion are</p> <p>1) Impacts on traffic flow in and out of our community, which already is a hardship for those who endure delays in getting where they wish to go.</p>
<p>Response: Average annual daily traffic data obtained from the State Department of Transportation indicate that approximately 17,675 vehicles per day travel on Kalanianaʻole Highway in the vicinity of the main entrance to Bellows AFS. Construction of 48 new recreational lodging units is projected to increase traffic on Kalanianaʻole Highway by approximately 1% (refer to Section 3.12.3 of the Final EA). However, the Air Force has considered public comments received on the Draft EA, and in response has determined to only approve development of up to 16 new recreational lodging units in the signed Finding of No Significant Impact. Traffic increases resulting from construction of 16 new recreational lodging would therefore be less than 1%. This level of traffic increase is expected to be less than significant. Projected impacts on traffic have been added to Section 3.12.3 of the Final EA.</p>	
2	<p>2) Impacts of additional near-shore military tourism facilities on nutrient loading into Waimanalo Bay, which is already demonstrating difficulty in sustaining ecological integrity under current levels of runoff and below-ground leach-field seepage.</p>
<p>Response: Development of individual wastewater systems (IWS), such as septic tanks and leach fields, must conform to the requirements of HAR 11-62, <i>Wastewater Systems</i>. Key requirements that must be met include: 1) the total wastewater flow from the development would not exceed 15,000 gallons per day, 2) the total wastewater flow into each IWS would not exceed 1,000 gallons per day, and 3) 10,000 square feet of usable land area would be available for each IWS. Wastewater plans are subject to the review and approval of the Director of the Department of Health. Upon commencement of design, the Air Force would coordinate design of the IWS with the DOH Wastewater Branch to ensure compliance with HAR Chapter 11-62. This requirement has been added to Section 3.12.3 of the Final EA.</p>	
3	<p>3) Concern that cultural artifacts are not likely to receive the respect that the community wishes, despite the claim that the development would "mitigate impacts" to these historical evidences of the heritage of our geographic region.</p>
<p>Response: The Air Force is committed to developing appropriate and respectful mitigation measures for cultural impacts during preparation of the archaeological data recovery plan, in consultation with the Hawaii State Historic Preservation Division and other stakeholders. A temporary curatorial facility at Bellows AFS has been identified to protect and preserve any cultural artifacts inadvertently discovered during ground disturbing activities for this project, or other projects at Bellows AFS.</p>	
4	<p>4) Continuation of the insult to U.S. citizens and other visitors being restricted in their access to this area by checkpoint guards and the threat of arrest or expulsion by armed military personnel.</p> <p>I support the "no-action alternative" and I urge the Air Force to engage with the Waimanalo community and the state to discuss options for remanding the Bellows area to the citizens of this state and country.</p> <p>Thank you for considering my views on the proposed construction of new restricted-to-military recreational lodging at Bellows AFS.</p>
<p>Response: Comment noted. However, decisions regarding the disposition of excess lands are outside the scope of this EA.</p>	

Project Title: Draft Environmental Assessment
 Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
 Reviewer: Robert and Winifred Simmons, Letter
 Date: 26 May 2009

Item	Comment
1	<p>We are thirty-nine year residents of Kailua presently living in Keolu Hills which is rather close to Bellows Air Force Base. We are acutely aware of air and marine traffic and noise including gun fire and othe explosive sounds from Bellows. The prevailing trade winds carry the noise, dust and fires toward our home. This contradicts your EA statement on page 3-2 regarding the direction of prevailing winds.</p> <p>We also travel on Kalanianaʻole Highway past Bellows on a regular basis for shopping and recreation. We are acutely aware of the present traffic congestion through Waimanalo particularly on weekends and weekday rush hours.</p>
<p>Response: Construction-related fugitive dust emissions at the proposed project site would be minimal and would not reach Kailua, regardless of the wind direction. Construction noise would decrease with distance from the project area through divergence, atmospheric absorption, shielding by intervening structures, and absorption and shielding by ground cover, but would not be impacted by the prevailing wind direction.</p> <p>Average annual daily traffic data obtained from the State Department of Transportation (DOT) indicate that approximately 17,675 vehicles per day travel on Kalanianaʻole Highway in the vicinity of the main entrance to Bellows AFS. Construction of 48 new recreational lodging units is projected to increase traffic on Kalanianaʻole Highway by approximately 1% (refer to Section 3.12.3 of the Final EA). However, the Air Force has considered public comments received on the Draft EA, and in response has determined to only approve development of up to 16 new recreational lodging units in the signed Finding of No Significant Impact. Traffic increases resulting from construction of 16 new recreational lodging would therefore be less than 1%. Projected impacts on traffic have been added to Section 3.12.3 of the Final EA.</p>	
2	<p>We attended the May 13th 2009 informational meeting at Bellows and the May 18th 2009 meeting of the Waimanalo Neighborhood Board. We have read the draft EA regarding construction of new recreational lodging at Bellows. That statement concludes that there will be no significant impact from this proposed project.</p> <p>It appears as though this assessment was conducted by individuals either employed by or having close ties to the US Air Force.</p> <p>The overall scope of this project in addition to the proposed townhouse type buildings seems to be to develop a golf course and some type of swimming facility.</p> <p>The environmental impact of these other projects as described on page 4-1 has not yet been addressed. We believe the project must be considered as a whole rather than taking a piecemeal approach.</p> <p>We believe the Air Force and the Marine Corps owe the public a detailed plan of their intended use and the impact of their intended use on the community and the environment.</p>
<p>Response: This assessment was conducted by the Air Force's Environmental Planning Element in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code Sections 4321-4374), the Council on Environmental Quality (CEQ) regulations implementing the procedural provisions of NEPA (40 Code of Federal Regulations [CFR] Parts 1500–1508), and Air Force policy and procedures (32 CFR Part 989). The conclusion, as stated in the Draft EA, that there will be no significant impact from the proposed project is made in accordance with the standards defined by the regulatory agencies that have jurisdiction over this project.</p> <p>This Draft EA only examines the potential environmental consequences associated with the proposed construction of up to 48 new recreational lodging units at Bellows AFS. No other projects are examined or approved as a result of this study. Any additional projects proposed subsequent to this EA would be subject to independent review in accordance with NEPA of 1969, the CEQ regulations implementing the procedural provisions of NEPA, and Air Force policy and procedures.</p>	
3	<p>As for the recreational use of Bellows we do not agree that the increased traffic through Waimanalo will have no significant impact.</p>
<p>Response: See response to comment no. 1.</p>	

Project Title: Draft Environmental Assessment
 Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
 Reviewer: Robert and Winifred Simmons, Letter
 Date: 26 May 2009

Item	Comment
4	<p>We do not agree that the proposed septic tanks and leach field(s) so close to the ocean will be of no significant impact.</p> <p>Response: Development of an individual wastewater system (i.e., septic tank and leach field system) for the proposed development would be coordinated with the Department of Health Wastewater Branch and would conform to the requirements of HAR 11-62, <i>Wastewater Systems</i>, such that no adverse impacts would be anticipated. This requirement has been added to Section 3.12.3 of the Final EA.</p>
5	<p>We do not believe that the construction of a golf course and its maintenance (water, fertilizer and pesticides) will have no significant impact.</p> <p>We know so little about the proposed swimming facility that its impact on the environment is difficult to assess.</p> <p>Response: The Air Force recognizes there is public opposition to development of a pool, water park, and golf course at Bellows AFS and has removed development of these facilities from consideration at this time. Section 4.1 of the Final EA has been revised to reflect this decision. As stated above, this Draft EA examines the potential environmental consequences associated with the proposed construction of 48 new recreational lodging units at Bellows AFS. No other projects are examined or approved as a result of this study. Any additional projects proposed subsequent to this Draft EA will be subject to independent review in accordance with the National Environmental Policy Act (NEPA) of 1969, the Council of Environmental Quality regulations implementing the procedural provisions of NEPA and Air Force policy and procedures. Concerned members of the community will be given the opportunity to participate in the EA process for any future proposed projects at Bellows AFS.</p>
6	<p>It must also be noted that the military has not been good stewards of the environment in Hawaii. We are speaking about the multiple dumpsites both on and off shore which contain munitions and other dangerous material, and the land that has been so severely contaminated with explosives that it cannot be adequately cleaned.</p> <p>The very recent history with respect to Bellows has not been good. We were recently told at a public hearing that a WWII dumpsite in an environmentally sensitive area had been adequately cleaned. But the truth was that the site still contained much dangerous material which could have easily been deposited into Waimanalo Bay. We are concerned that there are similar sites at Bellows and elsewhere.</p> <p>We suggest that adequate effort and money be spent clearing existing sites of military contamination before embarking on expanding facilities which may do further harm to the environment.</p> <p>Response: The Air Force has demonstrated good land stewardship practices at Bellows. We are very attentive to any environmental impacts to the āina. The original runway on consolidated land makes an ideal location for the proposed recreational lodging and also keeps any new construction off the shoreline and on previously disturbed soil. We will also continue the Community outreach after schools programs with Waimanalo Elementary School and Pope Elementary School to involve the community with the traditional Hawaiian burial vault, archaeological excavation techniques, Native Hawaiian burial practices, and planting native vegetation.</p> <p>The Air Force Environmental office has community involved programs that address potentially contaminated sites. They are called, Restoration Advisory Boards (RAB) and are comprised of Air Force representatives, Department of Health officials, contractors and interested community members. The Bellows RAB also includes a Marine Corps official and has been actively engaged with Waimanalo community members, meeting on a regular basis since 1999. The Air Force recognizes the importance of public participation in the Hickam Environmental Restoration Program and encourages involvement. Please contact our office for membership, meetings, and/or information on the environmental restoration sites.</p> <p>The AF is committed to being good stewards of the land. The AF cleaned the discovered dumpsite to environmental standards. The AF is unaware of any land under its management severely contaminated by UXO. Site cleanup efforts by other Services at other projects throughout Hawaii are outside the scope of this EA.</p>

Project Title: Draft Environmental Assessment
Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
Reviewer: Robert and Winifred Simmons, Letter
Date: 26 May 2009

Item	Comment
7	Our overall conclusion is that a true and complete Environmental Impact Statement must be conducted by an independent organization. This must address the short and longer term plans for the expanded use of Bellows.

Response: Preparation of an Environmental Impact Statement (EIS) is required when a project proponent has determined that a proposed project would result in a significant adverse impact that can not be mitigated. Adverse impacts to the cultural resources identified in the Draft EA would be mitigated through a program of data recovery such that the impacts would be less than significant. While the Air Force respectfully acknowledges the request for the preparation of an EIS, it is not warranted in this case.

Project Title: Draft Environmental Assessment
 Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
 Reviewer: R. Kawehiokalaninui-I-iamamao Kanui-Gill, E-mail
 Date: 1 June 2009

Item	Comment
1	<p>Please accept our OPPOSITION to the whole plan and especially the EA plan, of many obvious reasons. The first one is not to pay lipservice to our culture and especially as it relates to what is sacred to us, native tenant rights, the future and living in a pono way. The EA is the epitomy of what is wrong with American way of dealing with others...for us, we know we are occupied illegally and continue to educate the world about it in hopes of ending the occupation.</p> <p>The first issue in this regard is the TITLE. Show me your title and I will tell you that an executive order and a Quiet Title is NOT legal title. We at least have a contract from the Kings and Queens of Hawai'i, "reserving the rights of native tenants" for their heirs and successors forever on paper documented and passed in the Hawaii Legislature in 1846.</p> <p>You might say that most people in our community of Waimanalo can add this aspect of the cumulative view this way: "When the occupation ends, how is the military preparing for that?" Meanwhile a community plan would take precedent over the military plan as we have included those lands to be returned and used by us, the native tenants and want to see Restoration of our government, fish ponds, lo'i patches, livinging dependently and opening access to everyone for their understanding.</p> <p>I wrote to you to extend the time but got no response to that and that the neighborhood board is still opposed to it on this issue of TITLE and so are we. I will put together a book about what I would have turned in and still act on what is right. The point is, we never heard back from your office so I'm sending this mini version of and high lights to our concerns that there was no aloha from the military for the native tenants and an apology is needed.</p> <p>We are the Native Tenant's United, a locally organized union whose mission is, "to use , the Right of the Land as may best PROMOTE the PROSPERITY of the HAWAIIAN KINGDOM andthe DIGNITY of the native PEOPLE." (LAWS OF HAWAI'I, 1848, P. 22) WE are made up of the following 'ohana and kanaka maoli who are heirs and successors of the Crown and Government Lands...the native tenants.</p> <p>As the spokesperson for the NTU, based in Waimanalo it is our hope to resolve this problem in the near future in a respectable and peaceful fashion as humans who know what aloha is all about. Also the Po'o for The Hewahewanui 'Ohana Councils, Chairperson for Kauhale O Waimanalo and co owner of the Hawaiian Kingdom Office Of Health, Education and Economic Development Co.,created under the laws, constitution, treaty and conventions, that are international, Hawaiian and God's Law. Amongst other community affiliations built over 40 years of service to our people and Ko Hawai'i Pae Aina. I will send ahead my genealogy, community plan and structure of the NTU and our functions so you will know who to contact for whatever reason. Thank You. As the great, great, great grand niece of Bernice Pauahi Paki Bishop and Queen Liliuokalani Kamaka eha it is in their mana'o and spirit that I leave our words in your hands to what needs to be done and we will follow-up with you after more community meetings are completed. So far, no meetings we know of were held until after the fact. Do it over.</p> <p>In closing, these are our comments.</p>

Response: The Air Force is aware that there is some opposition to military use of ceded lands. While the Air Force recognizes some in the Native Hawaiian community wish ceded lands returned, resolution of the ceded lands issue is outside the scope of this EA.

**Construction of New Recreational Lodging,
Bellows AFS, Oahu, Hawaii**

Environmental Assessment

Response to Comments Received From

AGENCIES

Project Title: Draft Environmental Assessment
Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
Reviewer: Board of Water Supply, Keith S. Shida
Date: 14 April 2009

Item	Section No.	Comment
1	General	The comments in our letter dated January 22, 2009, which is included in the document, are still applicable.

Response: Thank you for your comment. The following statement has been added to Section 3.12.3 of the Final EA: "Per correspondence from the Board of Water Supply dated January 22, 2009, the existing water system is presently adequate to accommodate the proposed development (Appendix A)".

Project Title: Draft Environmental Assessment
Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
Reviewer: Department of Design and Construction, Craig I. Nishimura, P.E.
Date: 15 April 2009

Item	Section No.	Comment
1	General	The Department of Design and Construction does not have any comments to offer at this time.

Response: Thank you for reviewing the Draft EA. It is noted that the Department of Design and Construction has no comments on the Draft EA.

Project Title: Draft Environmental Assessment
 Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
 Reviewer: Department of Land and Natural Resources, State Historic Preservation Office
 Date: 13 April 2009

Item	Comment
1	<p>The proposed undertaking is the construction of 48 new recreational housing units at the end of the former runway on Bellows Air Force Base. Subsurface cultural resources associated with SIHP #50-80- 15-4856 including fire-pits, associated cooking stones, fish bones and marine shell dating to the pre- contact period are present in the Area of Potential Effect (APE). It is also a high probability that buried human remains are also present.</p> <p>This office reviewed a pre-construction DRAFT Archaeological Inventory Survey (DAIS) performed by T.S. Dye and Colleagues, Archaeologists Inc. in which we asked for extensive revisions [LOG NO: 2009.1303/DOC NO: 0903WT90]. The DAIS was not accepted by this office. These revisions requested are listed below:</p> <p><i>Please put the Ahupua'a and District and TMK and Acreage in the title of the report and on the cover. Please define the APE and note its acreage in the introduction. Also define the Phase I and Phase II boundaries within the APE.</i></p> <p><i>Though this may be a preconstruction Archaeological Survey it is still and Archaeological Inventory Survey. Please make the changes on the cover and elsewhere in the body.</i></p> <p><i>Quote the proper HAR. This is a §13-13 276 (Standards for Archaeological Inventory Surveys) not 279 (Monitoring).</i></p> <p><i>In general the discussion about the trench profiles is very confusing. This needs to be simplified and clarification of contexts done. As extensive discussion of the entire trench is offered, a profile drawing of the entire trench should be included with vertical lines delineating those sections discussed. It is much easier to follow rather than discussions of every few meters. Also, all features and pedestals will be presented in a full trench profile. Features should be discussed in order, and from a chosen end of the trench working west to east or east to west. Please see comments below:</i></p> <p><i>Please spell out BHT, RBHT, and BTH.</i></p> <p><i>Figure 6, page 20: FE5 is missing. It is also recommended that Fe 18 (water line and trench) be excluded as a feature (unless it is over 50 years old) and just mentioned, labeling it Fe 18 in two trenches is confusing. Are the paleosols found in BHT1 and 2 Features? In figure 6 on page 20 they are labeled as features but are not discussed. Please remedy.</i></p> <p><i>What is the rationale for the different contexts? Why are certain contexts labeled in the high 30's and 40's? There is no introduction stating how "contexts" were derived and how they are used. This is very confusing please clarify.</i></p> <p><i>You use three different definitions for cultural layers: lens, paleosol, and cultural layer. Please pick one or define them so that the difference can be understood.</i></p> <p><i>In the photograph of Fe 5 context 38 is labeled in the drawing but not the photograph, and is not discussed in the table. A context "30" is discussed in the table but it is not on the diagram or in the photo</i></p> <p><i>A collection was done from a small concentration at 33.0-33.5 west of the southeast corner. Is this a feature? If so, why is it not labeled as such in the body of the document? If a collection was made, it should probably get a Fe number.</i></p> <p><i>Why is Fe 9 discussed first (page 34) before Fe 2, 6, and 7? Fe 9 is discussed again on pgs 39 and 40. Please put discussion all together (photo strat sketch and discussion) preferably after discussion of the lower numbered features.</i></p> <p><i>Pg. 109, Pg. I, first sentence "significant for the information for the important information". Please correct.</i></p> <p>Until this office has received, reviewed and accepted a revised DAIS, we cannot concur with any agency finding of "no impacts to historic properties".</p> <p>Please contact Wendy Tolleson at (808)692-8024 if there are any questions or concerns regarding this letter</p>

Project Title: Draft Environmental Assessment
Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
Reviewer: Department of Land and Natural Resources, State Historic Preservation Office
Date: 13 April 2009

Item	Comment
	Response: State Historic Preservation Division (SHPD) comments on the Draft Pre-Construction Archaeological Survey have been incorporated; the Final Pre-Construction Archaeological Survey was submitted to the SHPD on June 3, 2009. In a letter dated August 26, 2009, SHPD concurred with the determination of No Significant Impact based on the Final Pre-Construction Archeological Inventory Survey.

Project Title: Draft Environmental Assessment
 Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
 Reviewer: Department of Land and Natural Resources, Morris M. Atta
 Date: 15 April 2009

Item	Comment
1	Other than the comments from Commission on Water Resource Management, Office of Conservation & Coastal Lands, Land Division-Oahu District, Engineering Division, Division of Aquatic Resources, the Department of Land and Natural Resources has no other comments to offer on the subject matter. Should you have any questions, please feel free to call our office at 587-0433. Thank you.
Response: Comment noted.	
Office of Conservation & Coastal Lands	
2	Not in Conservation District. We have no comments.
Response: Thank you for reviewing the Draft EA. It is noted that the proposed project area is not located within the State Conservation District and the Office of Conservation & Coastal Lands has no comments on the Draft EA.	
Land Division –Oahu District	
3	We have no comments.
Response: Thank you for reviewing the Draft EA. It is noted that the Land Division –Oahu District has no comments on the Draft EA.	
Engineering Division	
4	We confirm that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Flood Zone X. The National Flood Insurance Program (NFIP) does not regulate developments within Zone X.
Response: Thank you for confirming that the proposed project area is located in Flood Zone X. This is reflected in Section 3.7.2 of the EA.	
Division of Aquatic Resources	
5	On page 2-1, section 2.1 second paragraph, it states: <i>"Sewer service for the new lodging units would be provided through the use of a septic system with a leach field. The leach field would be constructed on approximately 1.5 acres within the grassed area between the former runway and Tinker Road."</i> DAR is hopeful that the Department of Health's Clean Water Branch will adequately address any water quality concerns and the appropriate Counties will adequately address the appropriate sewer system needs for the area to mitigate any adverse impacts to aquatic resources.
Response: Thank you for reviewing the Draft EA. Comments received from the Department of Health Clean Water Branch in a letter dated May 5, 2009 and supplemental comments received from the Wastewater Branch in a letter dated May 26, 2009 have been addressed in the Final EA.	
Water Resource Management Division	
6	We recommend that water efficient fixtures be installed and water efficient practices implemented throughout the development to reduce the increased demand on the area's freshwater resources. Reducing the water usage of a home or building may earn credit towards Leadership in Energy and Environmental Design (LEED) certification. More information on LEED certification is available at http://www.usgbc.org/leed . A listing of fixtures certified by the EPA as having high water efficiency can be found at http://www.epa.gov/watersense/po/index.htm .
Response: Preparation of design plans for the proposed recreational lodging units has not yet commenced. The Air Force will consider incorporation of water efficient fixtures and water efficient practices into the plans and specifications for the proposed recreational lodging during the design phase of the project.	
7	We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project to the existing area's hydrology while maintaining on-site infiltration and preventing polluted runoff from storm events. Stormwater management BMPs may earn credit toward LEED certification. More information on stormwater BMPs can be found at http://hawaii.gov/dbedt/czm/initiative/lid.ohp .

Project Title: Draft Environmental Assessment
Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
Reviewer: Department of Land and Natural Resources, Morris M. Atta
Date: 15 April 2009

Item	Comment
	Response: Site-specific BMPs would be developed and implemented by the construction contractor for compliance with National Pollutant Discharge Elimination System (NPDES) General Permit requirements. These BMPs would minimize the erosion of soil and discharge of pollutants into State waters during construction. Upon project completion, permanent erosion control measures would be applied; areas cleared or graded during construction would be stabilized with perennial vegetation or pavement. The proposed project would demolish the northern end of the paved runway and is therefore not expected to increase the area of impervious surfaces or rate of on-site infiltration within the proposed project area.
8	We recommend the use of alternative water sources, wherever practicable.
	Response: Comment noted. There are no alternative water sources at Bellows AFS that would support this project. However, the Board of Water Supply has confirmed that the existing water supply is adequate to accommodate the proposed development.
9	There may be the potential for ground or surface water degradation/contamination and recommend that approvals for this project be conditioned upon a review by the State Department of Health and the developer's acceptance of any resulting requirements related to water quality.
	Response: Use of individual wastewater systems (IWS), including septic tanks, must be authorized by the Director of the Department of Health. Design of the IWS for the proposed project would be coordinated with the Department of Health Wastewater Branch to ensure compliance with Hawaii Administrative Rules Chapter 11-62.

Project Title: Draft Environmental Assessment
Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
Reviewer: Department of Parks and Recreation, Lester K. C. Chang
Date: 3 April 2009

Item	Comment
1	The Department of Parks and recreation has no comment as the proposed project will not impact any program or facility of the department. You may remove us as a consulted party to the balance of the EIS process.

Response: Thank you for reviewing the Draft EA. It is noted that the Department of Parks and Recreation has no comments on the Draft EA, and has requested to be removed as a consulted party for the remainder of the EIS process.

Project Title: Draft Environmental Assessment for Construction of
New Recreational Lodging, Bellows AFS, Oahu, Hawaii
Reviewer: Department of Health
Date: 5 May 2009

Item	Comment
1	Any project and its potential impacts to State waters must meet the following criteria: <ul style="list-style-type: none"> a. Antidegradation policy (HAR, Section 11-54-1.1), which requires that the existing uses and the level of water quality necessary to protect the existing uses of the receiving State water be maintained and protected. b. Designated uses (HAR, Section 11-54-3), as determined by the classification of the receiving State waters. c. Water quality criteria (HAR, Sections 11-54-4 through 11-54-8).

Response: Comment noted.

	<p>You are required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for discharges of wastewater, including storm water runoff, into State surface waters (HAR, Chapter 11-55). For the following types of discharges into Class A or Class 2 State waters, you may apply for NPDES general permit coverage by submitting the applicable Notice of Intent (NOI) form:</p> <ul style="list-style-type: none"> a. Storm water associated with construction activities, including excavation, grading, clearing, demolition, uprooting of vegetation, equipment staging, and storage areas that result in the disturbance of equal to or greater than one (1) acre of total land area. The total land area includes a contiguous area where multiple separate and distinct construction activities may be taking place at different times on different schedules under a larger common plan of development or sale. An NPDES permit is required before the start of the construction activities. b. Discharges of hydrotesting water. c. Discharges of construction activity dewatering. <p>You must submit a separate NOI form for each type of discharge at least 30 calendar days prior to the start of the discharge activity, except when applying for coverage for discharges of storm water associated with construction activity. For this type of discharge, the NOI must be submitted 30 calendar days before the start of construction activities. The</p> <p>NOI forms may be picked up at our office or downloaded from our website at http://www.hawaii.gov/health/environmental/water/cleanwater/forms/genl-index.html.</p>
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Response: Proposed construction would require NPDES General Permits authorizing discharges of storm water associated with construction activities and discharges of hydrotesting waters. Applicable NOI forms would be submitted to the Department of Health, Clean Water Branch (CWB) at least 30 calendar days prior to the commencement of construction for processing.

3	For types of wastewater discharges not covered by an NPDES general permit or discharges to Class AA or Class 1 State waters, you may need an NPDES individual permit. An application for an NPDES individual permit must be submitted at least 180 calendar days before the commencement of the discharge. The NPDES application forms may be picked up at our office or downloaded from our website at http://www.hawaii.gov/health/environmental/water/cleanwater/forms/indiv-index.html .
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Response: Proposed construction would not result in discharges of storm water or hydrotesting water to Class AA or Class 1 State waters and, therefore, an individual NPDES permit would not be required.

4	A copy of the AFs request for review by the SHPD or SHPD's "no effect" determination letter or the results of the Section 106 consultation conducted for compliance with the National Historic Preservation Act would be included with the NPDES permit application.
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Response: Comment noted. The AF received a letter from SHPD on August 26, 2009 concurring with the AF's No Significant Impact determination. These results, as part of the Section 106 Consultation conducted for compliance with the National Historic Preservation Act, would be included with the NPDES permit application.

5	The DEA refers to a septic tank with leach field. It is recommended that you contact the DOH, Wastewater Branch to ensure compliance with HAR, Chapter 11-62.
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Response: Use of individual wastewater systems (IWS), including septic tanks, must be authorized by the Director of the DOH. Design of the IWS for the proposed project would be coordinated with the DOH Wastewater Branch to ensure compliance with HAR, Chapter 11-62.

Project Title: Draft Environmental Assessment for Construction of
New Recreational Lodging, Bellows AFS, Oahu, Hawaii
Reviewer: Department of Health
Date: 5 May 2009

Item	Comment
6	Please note that all discharges related to the project construction or operation activities, whether or not NPDES permit coverage and/or Section 401 Water Quality Certification are required, must comply with the Water Quality Standards. Noncompliance with water quality requirements contained in HAR, Chapter 11-54, and/or permitting requirements, specified in HAR, Chapter 11-55, may be subject to penalties of \$25,000 per day per violation.

Response: Comment noted.

Project Title: Draft Environmental Assessment for Construction of
New Recreational Lodging, Bellows AFS, Oahu, Hawaii
Reviewer: State Department of Defense, Engineering Office, Colonel John Hao, (Ret)
Date: 20 April 2009

Item	Comment
1	Sec. 3.4.3, P. 3-8. BMP during construction needs to consider the prevention of windblown erosion, so please add the spray of water to damp the soil surface during this period. Response: BMPs for dust suppression have been added to Section 3.4.3 of the Final EA.
2	Sec. 3.5.3, P. 3-8. For unknown quantity, concentration, physical chemical, and toxic characteristics of contaminants at site you probably need to conduct an environmental baseline survey along with this environmental assessment, if not already have. Response: The Proposed Action would enhance an existing recreational area. No information suggesting that there is a potential for contamination at the proposed project area has surfaced during development of the EA. Environmental baseline surveys are generally performed to support real estate transactions and/or facility closures. The Proposed Action involves new construction within an existing installation. The Air Force does not concur that preparation of an environmental baseline survey is warranted at this time.
3	Sec. 3.14.3, P. 3-18. No specific rain fall resulting in storm drain was discussed. Care needs to be taken for BMP as well as NPDES to drain away the potential surface water drainage/discharge especially during a rain storm. Response: Bellows AFS does not maintain a storm water drainage system. Soils within the proposed project area are highly permeable and storm water rapidly infiltrates.
4	App A, IICEP Coordination, Selected soil Interpretations. With Caving (cave-in) value of 1.00, the soil is very susceptible to the erosion/bleaching. Thus it requires reduced slope, vegetation covers and repairs/re-grading frequently especially after heavy rainfalls. Response: The proposed project area is relatively flat and would be landscaped with vegetative cover upon conclusion of construction activities. Air Force personnel perform site maintenance throughout the installation on an as-needed basis and would continue to do so.

Project Title: Draft Environmental Assessment for Construction of
New Recreational Lodging, Bellows AFS, Oahu, Hawaii
Reviewer: Department of Land and Natural Resources, State Historic Preservation Office
Date: 6 May 2009

Item	Comment
1	<p>In a letter from our office (LOG NO: 2009.1771/DOC NO: 0904WT78) sent to Ronnie Lanier and Jeffrey Pantaleo, we stated that we did not accept the Draft Archaeological Inventory survey (DAIS) and we asked for extensive revisions of the report from the contractor TS Dye and Colleagues. As yet we have not received the revised draft.</p> <p>It appears that the development of a Draft Finding of No Significant Impact is premature, as we have not accepted the AIS for this project. Therefore, until a final version of the AIS is reviewed and accepted by this office we do not concur with this determination by your agency.</p> <p>Please contact Wendy Tolleson at (808)692-8024 if there are any questions or concerns regarding this letter.</p>

Response: State Historic Preservation Division (SHPD) comments on the Draft Pre-Construction Archaeological Survey have been incorporated; the Final Pre-Construction Archaeological Survey was submitted to the SHPD on June 3, 2009. In a letter dated August 26, 2009, SHPD concurred with the determination of No Significant Impact based on the Final Pre-Construction Archeological Inventory Survey.

Project Title: Draft Environmental Assessment
Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
Reviewer: Board of Water Supply, Keith S. Shida
Date: 12 May 2009

Item	Section No.	Comment
1	General	The comments in our letter dated January 22, 2009 are still applicable.

Response: Thank you for your comment. The following statement has been added to Section 3.12.3 of the Final EA: "Per correspondence from the Board of Water Supply dated January 22, 2009, the existing water system is presently adequate to accommodate the proposed development (Appendix A)".

Project Title: Draft Environmental Assessment
Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
Reviewer: Office of Hawaiian Affairs, Clyde W. Namu'o
Date: 21 May 2009

Item	Section No.	Comment
1	Sec. 1	<p>OHA understands that this proposal seeks to construct up to 48 additional recreational lodging units at Bellows AFS in addition to current the current 107-cabin capacity. (DEA, page 1-2) We see that currently the Det 2, 18th Wing based out of Kadena Air Base, Japan operates and maintains Bellows AFS as a recreational area for military personnel. (DEA, page 1-1) The current mission at Bellows AFS is: <i>enhancing combat effectiveness by delivering secure, affordable, and customer-focused recreational services</i>. (Ibid.) OHA also recognizes that this facility is for the use and enjoyment of military personnel only, regardless of branch or active service and as such seeks to service a very large number of users worldwide.</p> <p>From the <i>History and Background</i> section of the DEA, OHA was unable to determine when Bellows became a recreational area. We seek clarification on this issue. Furthermore, OHA urges that part of the history of this area must include the period when the excess land from Bellows was to be returned to the state. By including this and the reasons that it never came to fruition, the applicant will address many concerns that are being raised by our beneficiaries.</p>

Project Title: Draft Environmental Assessment
 Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
 Reviewer: Office of Hawaiian Affairs, Clyde W. Namu'o
 Date: 21 May 2009

Item	Section No.	Comment
<p>Response: A Record of Decision (ROD) signed May 7, 1996 declared approximately 170 acres of land along the southern boundary of Bellows AFS excess to military requirements after construction of replacement facilities, relocation of activities necessary to vacate the land (to include relocation of the Hawaii National Guard) and cleanup of potential environmental impairments subject to appropriate use limitations to avoid incompatibility between future civilian uses and military activities on the retained areas. The surveyed area of 163 acres was divided into the three parcels: Parcel 1 (consisting of 3.326 acres of fee-owned land and 20.554 acres of ceded lands), Parcel 2 (85 acres of ceded lands), and Parcel 3 (54 acres of ceded lands).</p> <p>Because the excess land was located adjacent to Marine training areas, land use restrictions were placed on the parcels to protect training activities. Land use restrictions restricted development within a 55 L_{dn} noise contour for helicopter landings and also within a 700-foot setback from the beach to avoid conflicts with amphibious operations. The U.S. General Services Administration (GSA) provided a quitclaim deed to the State of Hawaii for the 20.554 acres of ceded land contained in Parcel 1 in August of 1999. However, the State of Hawaii refused to accept the parcel because of the land use restrictions. GSA subsequently transferred the property to the Department of the Navy on behalf of the Marines on January 3, 2002. Parcels 2 and 3 have the same land use restrictions as Parcel 1. Both the State of Hawaii and the Marines have expressed interest in acquiring the property. An Air Force decision regarding whether to continue with the excess process or transfer the property to the Marines has not yet been made.</p> <p>It is noted, however, that the proposed project area <i>is not</i> located within the approximately 170 acres declared excess to military requirements and a decision regarding whether to construct the new recreational lodging has no bearing on the decision regarding the transfer of Parcels 2 and 3 described above.</p> <p>Bellows Field was established as a separate permanent military post on July 22, 1941. Throughout World War II, aviation support and troop training were primary functions at the installation.</p> <p>The immediate post-war period saw the beginning of Bellows as a recreational area. Following the formal re-designation of Bellows Field as Bellows Air Force Base on March 26, 1948, the installation was placed in caretaker status, except for continued use of the recreational facilities, until 1951 when the Marine Corps began using the base for training.</p> <p>During the Cold War era, the major activities at Bellows were: Air Force communications support; operation of the DoD rest and recreation center; Hawai'i Army National Guard Nike-Hercules missile operations; and troop training, primarily by Marines based at Marine Corps Base Hawai'i.</p> <p>In October 1999, 1,704 acres were transferred from the Air Force to Marine Corps base Hawaii for ownership, responsibility, and control as Marine Corps Training Area Bellows. Control of Bellows was transferred to Kadena AFB on 29 Sep 2006.</p> <p>Bellows Air Force Station is currently used as a recreational and training facility. The primary mission is to provide recreational service, but Bellows Air Force Station still supports ancillary mission of training of military forces. Bellows Air Force Security Forces uses the Nike site, as well as the 800 buildings, for additional training besides training activities on the recreation area. Marine Corps Base Hawaii uses the Nike site for land navigation training. Bellows Air Force Station and the Honolulu Police Department conduct weekly Military Security Forces training with force protection, hostage entry, anti-robbery, and all-terrain vehicles. The 15th CES conducts training as well.</p>		
2	General	<p>This reviewer notes that on March 31, 2004 Lead Advocate Heidi Guth wrote to the applicant regarding the proposed installation of affordable rustic cabins at Bellows AFS. We then commented the Air Force's use of solar energy and of pre-existing cement slabs so that no further ground disturbance will occur in this "culturally sensitive area." We have been consistent in pointing our concerns to the applicant regarding Native Hawaiian issues at Bellows and in how the applicant can be more conscious of the adverse effects of their actions there.</p>

Project Title: Draft Environmental Assessment
 Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
 Reviewer: Office of Hawaiian Affairs, Clyde W. Namu'o
 Date: 21 May 2009

Item	Section No.	Comment
<p>Response: The project location being considered for construction of the proposed recreational lodgings in 2004 was an area bounded by Pacific Lane and Tinker Road, to the west of the existing 400 series cabins. This location was subsequently eliminated from further consideration due to archaeological resources discovered during an archaeological survey of the area. This area is labeled as "Alternative 1" on Figure 2-3 of the EA. Consistent with OHA's recommendation; the Air Force subsequently revised the Proposed Action to construct the new recreational lodgings within the footprint of a former paved runway and an adjacent grassed area. Backhoe trenches excavated within the footprint of the runway exposed a single pit feature and a paleosol that was the land surface during traditional Hawaiian times, but no cultural layers. These results were consistent with expectations that traditional Hawaiian cultural deposits would likely be absent beneath the runway due to grading and filling required for runway construction in the early 1940s.</p>		
3	General	<p>OHA points out that with regard to some of our beneficiaries' opinion of applicant stewardship in the area, the applicant has a poor history. (For example the 'discovery' of the heavily contaminated dump site LF23). Therefore, demonstrating more sensitivity in the environmental assessment to the local community and Native Hawaiian concerns will be a benefit. Revealing past land uses and community consultation were both also mentioned to you in our January 20, 2009 comment letter for this project.</p>
<p>Response: The Air Force strives to follow and has demonstrated good land stewardship practices at Bellows. We are very attentive to any environmental impacts to the āina. The original runway on consolidated land makes an ideal location for the proposed recreational lodging and also keeps any new construction off the shoreline and on previously disturbed soil. We will also continue the Community outreach after schools programs with Waimanalo Elementary School and Pope Elementary School to involve the community with the traditional Hawaiian burial vault, archaeological excavation techniques, Native Hawaiian burial practices, and planting native vegetation.</p> <p>The Air Force Environmental office has community involved programs that address potentially contaminated sites. They are called, Restoration Advisory Boards (RAB) and are comprised of Air Force representatives, Department of Health officials, contractors and interested community members. The Bellows RAB also includes a Marine Corps official and has been active engaged with Waimanalo community members, meeting on a regular basis since 1999.</p>		
4	General	<p>Additionally, pursuant to Section 106 of the National Historic Preservation Act of 1966, OHA wrote on February 25, 2009 regarding this proposal that we sought assurances that other Native Hawaiian Organizations with connections to the APE are being consulted regarding this proposed undertaking. We continue seeking such assurances.</p>
<p>Response: Air Force actions taken to engage the affected public in the environmental review process for the EA are summarized in Section 1.6 of the Final EA. A listing of community organizations and elected officials providing comment on the Draft EA is provided in Table 6-1 of the Final EA. Native Hawaiian Organizations providing comment included the Kailua Hawaiian Civic Club, the Waimanalo Hawaiian Civic Club, Kupuna Church, and Native Tenants United. Responses to all public comments received on the Draft EA are addressed in the Final EA.</p>		

Project Title: Draft Environmental Assessment
 Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
 Reviewer: Office of Hawaiian Affairs, Clyde W. Namu'o
 Date: 21 May 2009

Item	Section No.	Comment
5	General	<p>Regarding the proposal and its presentation in this DEA, OHA is disappointed by the alternatives analysis. We again re-iterate the concerns of fellow advocate Jason Jeremiah raised on January 20, 2009 in a comment letter for this proposal in being troubled that essentially there are only two alternatives presented for review. Since Bellows AFS is being managed internationally from an air base in Japan and can be used by military personnel worldwide, OHA asks for an assessment of other recreational facilities that could be used to meet the mission of Bellows AFS. OHA does not agree from the materials sent to us that this project may be necessary. We intuitively feel that there must be recreational facilities available to military personnel available worldwide that could take pressure off of AFS and this should be presented in the DEA.</p> <p>We remind the applicant that the heart of an environmental review is its discussion of alternatives. (40 C.F.R. § 1502.14) Every review must contain a "rigorous and objective" analysis of "all reasonable alternatives" to the proposed action. (40 C.F.R. § 1502.14(a)) Although not every alternative must be considered, "[t]he existence of a viable but unexamined alternative renders an environmental impact statement inadequate." (<i>Citizens for a Better Henderson v. Hodel</i>, 768 F.2d 1051, 1057 (9th Cir. 1985)) OHA urges that a required analysis of viable alternatives that will still meet the stated purpose and goal of the applicant be presented for review.</p>

Response: A project validation assessment prepared in 2005 included a market area analysis of other military recreational lodging facilities on Oahu. Other facilities offering recreational cabins include the Kaneohe Marine Corps Base (14 cabins), NAS Barbers Point (24 cabins), and the Piilaa Army Recreation Center (42 cabins). Occupancy rates at these facilities are also between 92 and 98% in the peak-season and drop to 80 to 85% in the off-season. Hale Koa Hotel offers resort style accommodations that are not comparable to the amenities offered at cabin facilities. Kaneohe Marine Corps Base, NAS Barbers Point, and the Piilaa Army Recreation Center are under control of the Marines, Navy, and Army respectively. Development of additional cabins at these locations would not provide a means for Bellows AFS to fulfill its mission, and therefore, would not fulfill the purpose of and need for action.

Three alternative sites were considered within Bellows AFS, but all three were dismissed from further consideration due to the relatively greater likelihood of encountering significant historic resources at these locations compared to proposed location, and other site constraints. The three alternative sites considered at Bellows AFS, but subsequently eliminated from further consideration are summarized in Section 2.4 of the EA.

6	Sec. 3.2.2, pg. 3-3	We are further frustrated by page 3-3 of the DEA that has federally listed bird species observed or potentially occurring at Bellows AFS, some of which are a species of concern, threatened or endangered and yet states, "No federally protected or other special status species are known to use the project area." This should be clarified.
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Response: Federally protected species have been observed or potentially occur within Bellows AFS generally, but have not been observed within the project area specifically. The proposed project area consists of paved runway and maintained lawn, and therefore, has a low habitat value for wildlife. The following text has been added to Section 3.2.2 to clarify the location of protected species at Bellows AFS: "Endangered waterbirds such as the Hawaiian duck, Hawaiian coot, common moorhen, and Hawaiian stilt have been observed within the boundaries of Bellows AFS, primarily along the shore and wetland areas of Waimanalo Stream (approximately 0.5 mile from the proposed project area). The Newell's shearwater is also potentially occurring within the boundaries of Bellows AFS, but has not been observed at the proposed project area."

The USFWS, in their response dated July 22, 2009 to a request for concurrence, determined that the action will not affect the Hawaiian hoary bat and listed Hawaiian waterbirds, and may affect, but is not likely to adversely affect, the Newell's shearwater and listed sea turtles.

Project Title: Draft Environmental Assessment
 Construction of New Recreational Lodging, Bellows AFS, Oahu, Hawaii
 Reviewer: Office of Hawaiian Affairs, Clyde W. Namu'o
 Date: 21 May 2009

Item	Section No.	Comment
7	Ex. Sum	OHA also expresses concern over the approximately 1.5 acre leach field to be constructed within the grassed area between the former runway and Tinker Road. We ask if this sewage treatment takes place within the special management area, shoreline setback and the zoning of the parcel. This represents a long-term adverse impact that the applicant does not include in addition to the permanent visual impacts and loss of existing resources. (see page i <i>Proposed Action</i>) We also do ask what Department of the Army permits will be required and if a wetland determination will be necessary for this project.

Response: The project area is within the Special Management Area but is not within the shoreline setback. Design for the individual wastewater system (i.e., septic tank and leach field) to serve the new lodging units would be coordinated with the DOH Wastewater Branch to ensure conformance with Hawaii Administrative Rules, Chapter 11-62, *Wastewater Systems*. Neither a Department of the Army Permit nor wetland delineation would be required to implement the proposed project.

8	General	OHA would like to suggest that if the proposal does go forward, the project area be landscaped with drought tolerant native or indigenous species that are common to the area. Any invasive species should also be removed. Doing so would not only serve as practical water- saving landscaping practices, but also serve to further the traditional Hawaiian concept of malama `aina and create a more Hawaiian sense of place. This would also help to reduce the amount of impervious surfaces in the project area, thereby reducing runoff as well. Tree and landscape planting to shade paved parking areas and provide shade and cooling to building elements and outdoor use areas should also be considered.
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Response: Comment noted. Landscaping plans have not been prepared and would be developed during the design phase of the project. The Air Force will consider incorporation of these recommendations should the project proceed.

9	General	Also, because this project is so close to the coast, all outdoor lights should be fully shaded or full cut-off styles. Uplighting should be avoided. Every effort should be made to avoid lighting situations where light glare projects upwards or laterally especially toward the shoreline. Large, high-intensity floodlights located on building tops or poles should also be avoided. Use of amber colored or other color (such as blue or green) filters or bulbs should be used to assist in decreasing risk of seabird attraction and the potential confusion of honu. For the same reasons, OHA also recommends the use of motion detection-activated lights to prevent lights from being on for extended periods of time. Also, the painting of buildings and other facilities should be in earth tones; white or reflecting colors are to be avoided. Thank you for the opportunity to comment. If you have further questions, please contact Grant Arnold by phone at (808) 594-0263 or e-mail him at granta@oha.org .
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Response: Lighting measures to reduce the attraction of seabirds have been incorporated as mitigation measures into Sections 3.2.3 and 3.15 of the EA.

Project Title: Draft Environmental Assessment
 Construction of new Recreational Lodging, Bellows AFS, Oahu, Hawaii
 Reviewer: Department of Health, Wastewater Branch
 Date: 26 May 2009

Item	Section No.	Comment
1	General	The project is located in the Critical Wastewater Disposal Area (CWDA) where no new cesspools will be allowed. It is also located in the Pass Zone.
Response: Comment noted. Cesspools are not proposed to support the proposed recreational lodging.		
2	General	Based on the information provided, the total wastewater flow for the proposed development will exceed 15,000 gallons per day. Therefore, in accordance with Hawaii Administrative Rules (HAR), Chapter 11-62, Section 11-62-31.1(2)(B), the installation of individual wastewater system(s) (IWS) which includes septic tank system and leach field will not be allowed for this project. We would require that a wastewater treatment plant be constructed in accordance with Hawaii Administrative Rules (HAR), Chapter 11-62, Subchapter 2 requirements for this development.
<p>Response: The Air Force estimates that wastewater generation rates for the proposed recreational lodging would be 50 to 100 gallons per person per day, based on units having one bathroom each and modest kitchen facilities. The two-bedroom units would provide accommodation for up to four persons. HAR §11-62-31.1(2) specifies that the total wastewater flow from a development shall not exceed 15,000 gallons per day and the total wastewater flow into each individual wastewater system (IWS) shall not exceed 1,000 gallons per day.</p> <p>Assuming an average per capita generation rate of 75 gallons per day, and 4 persons per unit, the development could support up to 48 lodging units without exceeding the 15,000 total gallons per day criteria. However, the Air Force has reduced the scope of the project and has now decided to only authorize construction of up to 16 cabins at this time, as noted in the signed Finding of No Significant Impact. In order to not exceed the 1,000 gallons per day limit for each IWS (i.e. septic tank), multiple septic tanks would be required to provide wastewater treatment for buildings containing more than two lodging units.</p> <p>Development of design plans for the proposed project has not commenced. Upon commencement of design, the Air Force would coordinate design of the IWS with the Department of Health Wastewater Branch to ensure that the proposed IWS would conform to the State wastewater regulations contained in HAR Chapter 11-62.</p>		
3	General	We encourage the developer to utilize the recycled water for irrigation and other nonpotable water purposes. We also encourage the developer to utilize the recycled wastewater in major common areas such as parks, golf courses and other open spaces or landscaping areas:
Response: Comment noted. Opportunities to utilize recycled water do not currently exist at Bellows AFS but may be considered in the future.		
4	General	All wastewater plans must meet Department's Rules, HAR Chapter 11-62, "Wastewater Systems." We do reserve the right to review the detailed wastewater plans for conformance to applicable rules. If you have any questions, please contact the Planning & Design Section of the Wastewater Branch at 586-4294.
Response: Comment noted. Development of design plans for the proposed project has not commenced. Upon commencement of design, the Air Force would coordinate design of the IWS with the Department of Health Wastewater Branch to ensure compliance with HAR Chapter 11-62.		